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THE IMPACT OF CITIZEN PARTICIPATION ON THE IMPLEMENTATION OF THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM IN COLUMBUS, OHIO

The Ohio State University

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THE IMPACT OF CITIZEN PARTICIPATION ON THE IMPLEMENTATION
OF THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM IN
COLUMBUS, OHIO

DISSERTATION

Presented in Partial Fulfillment of the Requirements for
the degree Doctor of Philosophy in the Graduate
School of The Ohio State University

By
Craig A. Rimmerman, B.A., M.A., Ph.D

The Ohio State University
1984

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1984
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- ii -
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- iii -
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Chapter I

INTRODUCTION

For students of both public policy and democratic political theory, citizen participation in the implementation of a federal program raises compelling questions regarding the consequences of this participation for the citizenry, for the distribution of program benefits, and for the overall implementation of the program at the local level. For political scientists who wish to contribute to the larger society and the discipline, their evaluation of the impact of citizen participation on the implementation of a federal program at the local level affords the opportunity to further the implementation literature and also offer empirical evidence to the important debate between participatory democrats and democratic elitists regarding the role of the citizenry in a democratic society. This dissertation will be guided by an attempt to evaluate critically the participatory democrats' contention that meaningful and effective citizen participation can be achieved at the local level if a viable citizen participation mechanism is established. The research will also attempt to explain the consequences.
of citizen participation for the implementation of the Community Development Block Grant (CDBG) program in Columbus, Ohio and evaluate the impact of citizen participation on program benefits.

The CDBG program has been chosen for this research because it affords an excellent opportunity to study both the impact of citizen participation on the attitudes of citizen participants and on program implementation. In 1974, the Community Development Block Grant (CDBG) program was enacted and was re-enacted with some key changes in the citizen participation element during 1977 and 1981. A central element of Nixon's New Federalism, the CDBG program consolidated a number of categorical grants, including urban renewal, model cities, open space and historical preservation, and basic water and sewer facilities. Given the consolidation of these programs into one block grant, it is not surprising that implementation problems have plagued the CDBG program. The Advisory Commission on Intergovernmental Relations contends that because community development has been used in a sweeping fashion "to describe a plethora of programs and policies bent upon rebuilding and preserving the nation's urban areas, and improving the lives of the residents therein," it has been a key factor in fostering local implementation problems. A

second major factor contributing to poor implementation of the CDBG program has been the federal-local nature of the program. The CDBG legislation provides that cities with a population of over 50,000 people and specific counties over 200,000 can apply for CDBG funds. "and all other units of general local government are eligible for funds on a discretionary basis."

Usage of the funds falls under the domain of the locality as long as "its selected uses fall within the specified program parameters." As the Advisory Commission on Intergovernmental Relations suggests, the implementation problem occurs here when a city or county is operating under the imperatives of resource scarcity, and as a result can only pursue a few of the program objectives. Consequently, "the individual local programs often become a mere fragment of the comprehensive program envisioned."

Perhaps this fragmentation problem is nowhere more evident than in the citizen participation element of the CDBG program. The Housing and Community Development Act of 1974 was amended in 1977 and mandated that cities establish citizen participation plans that offered citizens minimal information regarding the program and also a viable oppor-

---


3 *Community Development: The Workings of a Federal-Local Block Grant* p. 1.
tunity to express their views during announced public hearings. The amended legislation also specified that citizens had the right to submit complaints regarding applicant performance. According to the statute, the CDBG program application process was designed principally to benefit low and moderate income persons. Since 1977, most localities have instituted Communitywide Advisory Committees that are comprised of citizen and civic leaders. While the 1977 changes tightened the citizen participation requirements, they did not eliminate the fact that this program participation is merely advisory in nature and cannot be viewed as restricting "the responsibility and authority of the applicant for the development of the application and the execution of its community development program." As a number of studies have indicated, citizen participation requirements formulated at the national level have not been satisfactorily met in localities. This has led to much criticism of the local implementation of the CDBG program. It will be interesting to ascertain whether the Reagan cutbacks in the citizen participation process have affected the implementation of the CDBG program in


5 See chapter two for a detailed discussion of the findings revealed by Brookings, HUD, and the Advisory Commission on Intergovernmental Relations.
Columbus.

A key goal of this dissertation research is to ascertain the impact of citizen participation on the implementation of the CDBG program in Columbus, Ohio during 1983 and also provide a longitudinal study of the implementation of the program under Presidents Ford, Carter, and Reagan. More specifically, the factors influencing one dependent variable in this dissertation, CDBG program performance, will be identified by addressing three key questions: 1) who governs?, 2) how are the funds used?, 3) who benefits? The first question refers to the role of program administrators, elected officials, and citizens in the grant application formulation and implementation process. The second question refers to the kinds of grants that are doled out by H.U.D., and the third question will allow identification of what types of people receive program benefits “and how this relates to the intent of the laws.” Other key questions addressed in this dissertation are:

1. What is the impact of the Reagan reforms on the overall implementation of the CDBG program?
2. How do the Columbus implementation findings extend or reject previous models of the policy implementation process?

---

3. What factors have affected the implementation of citizen participation in the Columbus CDBG program?

4. What are the forms of bureaucratic enfranchisement open to the Columbus citizenry in the CDBG implementation process and which type is most effective in affecting decisions regarding the distribution of program benefits?

5. What do the Columbus citizen participation findings suggest regarding achieving meaningful and effective citizen participation?

6. What are the advantages and disadvantages of increased citizen participation in urban service delivery decision making?

7. What are the implications of the Columbus findings for policy implementation, urban politics, and democratic theory?

**METHODOLOGY**

The case study approach is a valuable vehicle for studying policy implementation because it provides a rich context for explaining existing propositions within the framework of established generalizations. While the case study cannot be the basis for a valid generalization nor for disproving an already existing generalization, it can provide detailed evidence to reinforce and extend existing policy
implementation frameworks. The more qualitative evidence that is collected to support a policy implementation framework, the more confidence we can have in using a specific framework to guide implementation research. The conceptual implementation framework offered by Van Meter and Van Horn and later revised by Van Horn builds upon previous empirical implementation research and attempts to impose order on "the disparate character of the public policy literature and the policy implementation process." This model has been chosen to guide the evaluation of the 1983 grant application process and overall program performance because it is the most rigorous framework available to implementation scholars.

Case studies can aid in identifying chronic problems that plague policy implementation. The cumulative, additive effect of numerous case studies offer policy analysts a wealth of rich data to corroborate or cast doubt on previous implementation conclusions. In addition, the case study approach permits the policy researcher to study the complex implementation process more rigorously. It also affords the analyst the opportunity to describe richly the flavor of the policy implementation environment within an analytical framework. Perhaps most importantly, the detailed case study will encourage comparative analysis in

the future with the hope of reinforcing or challenging existing policy implementation frameworks.

While this is a case study of the implementation of the CDBG program in Columbus, it has implications for the larger society. The typicality and the uniqueness of the local political environment in Columbus needs to be identified. Like neighborhoods in most large American cities, Columbus neighborhoods are defined artificially by urban planners who impose territorial boundaries. As argued in chapters six and seven, the lack of a Rousseauean feeling of community has negative consequences for achieving meaningful and effective citizen participation in Columbus.

The Columbus policy implementation process is and has been characterized by the "street fighting pluralism" between competing interest groups and neighborhood organizations that characterizes service delivery and the distribution of program benefits in American urban areas. But unlike more segregated cities with a stronger history of neighborhood and elite conflict such as New York, Boston, Chicago, and Cleveland, Columbus' neighborhood organizations and interest groups are less likely to be organized along class and racial lines. The result is that Columbus organizations are more likely, comparatively speaking, to work closely with bureaucrats and local elected officials.
In the absence of an active mayor, Columbus bureaucrats play a vital role in policy implementation. Like most urban bureaucrats, Columbus Development Department bureaucrats have the time, resources, and expertise needed to understand the complexities of a federal program. Elected at large every two years, Columbus city council members must appeal to citywide interests rather than respond directly to parochial interests as they would under a ward or district representation system. The differing roles performed by key Columbus implementation actors and the characteristics of the local implementation environment are outlined in chapter three.

Data is provided based on open-ended personal and telephone interviews with city council members, Department of Development and HUD bureaucrats, Community Development Task Force members, and citizens, observing community meetings, and examining federal and local documents. Interviews with long time observers and examinations of local CDBG documents provided a longitudinal view of the Columbus implementation process.

A combined purposive, chain sampling technique was used to identify interviewees. This method allows the researcher to select respondents who not only have attended community meetings, but also those who have been identified by other implementation actors. After each interview, Devel-
Open Department and HUD bureaucrats, city council members, and community activists were asked to identify names of potential respondents. This approach provided the opportunity to interview longtime implementation actors who were not clearly visible during 1983. Citizens who attended target area meetings in the Bellows, Harrison West, and Southside One target areas were identified by examining the neighborhood meeting sign-in sheets. These individuals were contacted by telephone within one week after attending their respective target area meetings.

AN OVERVIEW OF THE ARGUMENT

This research provides empirical support for the continued use of the backward mapping approach to the study of policy implementation. Columbus Development Department bureaucrats were the most powerful actors in the CDBG implementation and service delivery process. The formal citizen participation mechanism proved to be a weak citizen participation vehicle for disenfranchised low and moderate income neighborhoods. In the absence of a meaningful and effective citizen participation vehicle, conflict oriented interest and community group participation was the most viable form of citizen representation. The prospects for achieving meaningful and effective citizen participation,

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See appendix two for a more detailed discussion of sampling procedures and interview techniques.
where a sense of community identity, education and the development of citizenship, and self determination by those participating are present, depends upon the willingness of local implementation actors to acknowledge the potentially important role that citizens can play in communicating neighborhood needs to local decision makers. In the absence of meaningful and effective citizen participation, it is argued that disenfranchised citizens should both look to bureaucrats and local political officials who have a genuine desire to respond directly to their needs, and participate in community groups that will mobilize and represent their interests.

CHAPTER DESCRIPTIONS
This dissertation is comprised of seven chapters. Chapter two identifies the factors leading up to the formulation, legitimation, and implementation of the CDBG program. It focuses on the Great Society programs of the 1960's and examines the citizen participation elements of the War on Poverty and Model Cities. The rationale and elements of Nixon's New Federalism proposals are also considered. A significant portion of chapter two details the legislative history of the CDBG program and legislative goals. Chapter three offers background information regarding the political and bureaucratic structure and climate in
Columbus, Ohio. The implementation of the CDBG program in Columbus, since its inception in 1974, is considered. The Columbus citizen participation mechanism is examined historically and the impact of the Housing and Community Development Act of 1977 is considered. This chapter also provides information regarding how Columbus compares with other localities on the citizen participation element of the CDBG program.

Once the historical context for the CDBG program is set in chapters two and three, it is then possible to examine empirically the overall implementation of the CDBG program in Columbus during 1983. In chapter four the 1983 implementation process is compared to the implementation of the CDBG program in previous years. Data is provided based on interviews with members of City Council, Department of Development bureaucrats, CD Task Force members, and neighborhood organizations and interest groups. The implementation findings are placed within the context of models of the implementation process. Chapter four also offers revisions and extensions to previous implementation models based on the empirical work conducted in Columbus.

Chapter five examines the implementation of the citizen participation element of the CDBG program in Columbus during 1983. Data is provided based on interviews with members of City Council, Department of Development bureau-
crats, CD Task Force members, and neighborhood organizations and interest groups regarding whether Columbus has established an effective citizen participation mechanism. The impact of citizen participation on the overall implementation of the CDBG program and the distribution of program benefits is also identified in chapter five.

Once citizen participation is evaluated empirically, it is then possible to assess the implications of these findings for urban service delivery, policy implementation, and democratic theory. Chapter six evaluates the formal citizen participation mechanism critically and considers how to hold bureaucrats accountable in a democratic society. The arguments of participatory democrats are assessed critically in light of the empirical research conducted in Columbus.

Chapter seven offers a conception of the role of the policy analyst in a democratic society in light of the research conducted. Specifically, it is argued that policy analysts can make a major contribution to the discipline, to the larger society, and to students in the classroom by studying program implementation and offering policy recommendations. Policy recommendations are provided based on the assumption that citizens, bureaucrats, and elected officials can work together to create a viable citizen par-
ticipation mechanism that will aid overall program implementa-
tion.
Chapter II

CITIZEN PARTICIPATION IN THE WAR ON POVERTY.
MODEL CITIES, AND THE COMMUNITY DEVELOPMENT BLOCK
GRANT PROGRAM

I have called for a national war on poverty. Our objective: total victory ... Through a new community action program we intend to strike at poverty at its source—in the streets of our cities and on the farms of our countryside among the very young and the impoverished old. This program asks men and women throughout the country to prepare long-range plans for the attack on poverty in their own local communities. These are not plans prepared in Washington and imposed upon hundreds of different situations.

With this declaration of war, submitted to Congress in 1964, President Lyndon Johnson embraced citizen participation. "Maximum feasible participation" in federal programs at the local level was a central goal of the Great Society and the War on Poverty. Johnson's Model Cities proposal, for example, introduced to Congress and the American people in 1966, rested on the idea that "widespread citizen participation" should characterize the implementation of this federal categorical grant-in-aid program. This chapter provides a historical examination of the literature dealing with the implementation of these categorical grant programs.
and with the implementation of citizen participation. While some policy analysts, such as Sar Levitan and Robert Taggart, regard the citizen participation elements of LBJ's Community Action Programs and Model Cities as having been somewhat successful in dealing with the problems of poverty and crime in urban America, others such as Daniel Patrick Moynihan, Peter Harris, Martin Rein, and Frances Fox Piven and Richard Cloward offer indictments of program implementation.

This historical overview of citizen participation in the categorical grant-in-aid programs of the 1960's sets the groundwork for a general discussion of the factors leading to the creation of the Community Development Block Grant (CDBG) program. The rationale for the creation of the program and the citizen participation element is considered in the second half of this chapter. The following questions are addressed:

1. What was the rationale for the creation of the War on Poverty and Model Cities? What were the espoused goals of these programs? What have been the competing interpretations of program implementation?

2. What was the rationale for Nixon's New Federalism? How did his proposals alter federal/local intergovernmental relationships?
3. What were the original goals of the CDBG program and how have they changed under Presidents Ford, Carter, and Reagan? How does citizen participation in the CDBG program differ from citizen participation in the programs of the 1960's?

**PARTICIPATORY DEMOCRATS AND STABILITY THEORISTS**

While Lyndon Johnson and his domestic advisors were formulating the Great Society, the president had early support from students and grass-roots activists who rallied around the slogan of "participatory democracy." A number of national and local campus organizations, founded during the early and mid 1960's, became vehicles for the new student activism that formed the basis of New Left politics. Students for a Democratic Society, for example, embraced a vision of participatory democracy which would allow "those who are affected by decisions make those decisions, whether the institutions in question be the welfare department, the university, the factory, the farm, the neighborhood, the country." The arguments for participatory democracy were based upon two central tenets—1) that increased citizen participation would in fact contribute both to the development of the individual and to the individual's realization

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10 Evans, p. 135.
of citizenship and 2) that individuals should participate in community and workplace decisions that affect the quality and direction of their lives.

Not everyone shared this vision, however. There were some who believed that too much democracy would lead to a crisis and threaten the overall stability of the American system. The urban riots of the 1960s lent prima facie credence to such beliefs. Reflecting back on these events in 1975, Samuel Huntington argued that a more "balanced existence" was needed if our system was to survive.11 Huntington's diagnosis that the "distemper of democracy" could lead to the destruction of the entire political system, however, was not new, for it has been one theme throughout American history. Two hundred years earlier, the Founding Fathers worried that the new American republic might be as short lived as the ancient democracies they feared and loathed. Given that human nature was "ambitious, vindictive, and rapacious,"12 they knew that too many governing privileges, much less democracy should not be granted. As a result, the framers placed several limitations on voting, including property restrictions and the constitutional requirement that state legislatures would

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select U.S. senators. More recently, Seymour Martin Lipset echoed the concerns of the framers when he wrote that it is necessary still to "sustain the separation of the political system from the excesses inherent in the populist assumptions of democracy..." 13

But to Lyndon Johnson and his advisors, citizen participation was an integral component of his War on Poverty. As Robert Haveman points out, there were a number of overriding factors that allowed the War on Poverty to be accepted by Congress and the American people:

The origins of the war on poverty are several: compassion stemming from abysmal hardship evident in pockets of the population identified by geography, culture, and race; embarrassment over the inconsistency of this hardship with the image of U.S. affluence; fear regarding the potential for violence and disruption inherent in such inequality; excitement stimulated by the call for progressive new policies by an administration with "liberal" inclinations (or at least rhetoric); and faith in the efficacy of social planning stimulated by social scientists and other academics whose public respect and influence was at its zenith. 14

In this favorable climate the Economic Opportunity Act was adopted in 1964, and with it, citizen participation in federally funded categorical grant programs in American cities was established. The legal basis for this proliferation of


citizen participation in the implementation of federally funded programs at the local level was provided in the 1964 act, which called for the "maximum feasible participation of residents of the area and members of the group served."15

THE IDEA OF "MAXIMUM FEASIBLE PARTICIPATION"

The slogan "maximum feasible participation" made its way into the first draft of the Economic Opportunity Act of 1964 with little opposition. But it proved to be the source of great frustration for bureaucrats, and the object of attack by critics,16 especially when the War on Poverty endured severe implementation problems during the mid 1960's. In the words of Ralph Kramer, "maximum feasible participation" intended to "stimulate local communities to take the initiative in developing programs and mobilizing their resources in a concerted and coordinated manner for a broadly based, long-range attack on poverty."17 Yet given the ambiguous phrasing of the legislation, diverse interpretations arose. Some believed that "maximum feasible participation" would reduce the alienation of the unin-

volved poor who felt that the political system did not respond to its concerns. Others in OEO viewed the involvement of the poor in the War on Poverty as a way to redistribute political power, change government allocation of resources, and legitimize Johnson's entire antipoverty effort. A third group within OEO felt that "maximum feasible participation by the poor would provide them with employment in various capacities, particularly as nonprofessionals working for the local anti-poverty programs." 18

The ambiguity of the phrase is further revealed in these important questions posed by Kramer:

Did it imply an advisory relationship in which the poor were to be consulted as consumers whose opinions should be taken into account along with those of other interest groups? Or should the poor have a more substantial part in planning programs and in policy making? Did maximum feasible participation imply administrative control of the program by target area residents? Furthermore, who could speak for or represent "the poor"? Did the poor refer to all residents of the target area or only those with an income below some stated maximum? 19

The ambiguity of "maximum feasible participation" led Moynihan to offer a scathing indictment of the vagueness of the legislation in Maximum Feasible Misunderstanding. In the eyes of Moynihan, this rhetorical ambiguity led to poor implementation of the entire community action program from the outset and prevented the poor from engaging in meaning-

18 Kranz, p. 55.

19 Kramer, p. 2.
ful citizen participation.

To both mobilize and coordinate the resources needed to deal with poverty at the local level, the Economic Opportunity Act "called for the creation of Community Action Programs to improve and expand the social and educational services available to the poor." Community Action Programs were referred to as "umbrella organizations" because their role was to "represent an alliance among all the agencies and interests in the community concerned with poverty." Community Action Agencies (CAAs) were also formed to provide services, mobilize public and private resources, and achieve "maximum feasible participation." The assumption here was that if the poor were ever to escape their condition, they must help plan and create the very programs designed to aid them, particularly those improving their chance of gaining employment. One CAA staff member described the role of the representatives of the poor on his agency's board:

The representation feature of the representatives of the poor is extremely important. They are just like other politicians: they seek the office by getting a petition signed by eligible poor persons, and after they're elected they hold


21 Kramer, p. 9.

22 Advisory Commission on Intergovernmental Relations, *Citizen Participation in the American Federal System* p. 110.
meetings with the constituents who sent them here, and those meetings keep them honest in terms of trying to be truly representative.23

According to John G. Wofford, staff assistant to the deputy director of the community action program, a key principle emphasized by OEO administrators "was that it was the validity of the representation that was important: the representative himself need not be poor."24 The vagueness of the legislation led to confusion regarding the role of the poor in community action agencies. To be sure, the problem of identifying and selecting "those who could speak for or represent the poor, and how to involve the poor in a relatively brief period of time in a manner that would not unduly hamper the process of program development"25 proved to be crucial implementation problems plaguing the War on Poverty.

In the eyes of some of the most vociferous critics of the Johnson administration efforts, "the campaign for massive feasible participation by the poor in the anti-poverty program must now be seen as a charade."26


25 Kramer, p. 3.

ber of different reasons offered by critics of the program to support this claim. The first and most important is the vague and ambiguous language in which legislative goals regarding citizen participation were stated. The implementation literature suggests that vague and unclear goals at the formulation stage will likely impede successful implementation at the local level. Van Horn contends that "the task of identifying the goals of public policy is often very difficult. Policymakers may be intentionally vague; their goals may be conflicting and inconsistent, hard to discern or unstated."27 Irving Lazar identifies "the lack of structure and clarity of purpose"28 that has plagued the entire effort to involve the poor in the implementation of Johnson's War on Poverty. In his discussion of community action agencies in the War on Poverty, Henry Aaron speaks of the "vague and inflated" program objectives that led to implementation problems.29 The vague role and responsibilities of the poor on the local community action agencies was a second major implementation problem. In the eyes of


many, the poor simply did not have the information or the motivation to become actively involved in community affairs. One private social agency director suggested that participation of the poor without professional advocates is like Vietnam—thrusting democracy on people who are not ready for it."\(^{30}\) Harris and Hein cite the problem of leaderless, ill-educated people of a city slum attempting to communicate effectively with the university professors and foundation executives who had influenced citizen participation in the formulation stage, and the professional advocates who were needed to mobilize the poor.

Many observers believe that "maximum feasible participation" was not achieved because few citizens participated when given the opportunity to participate in local elections to choose representatives for CAP boards and councils. According to Sar Levitan, voter participation in these elections "ranged from a low of one percent to a high of less than five percent of those eligible."\(^{31}\) In a Brandeis University study of community representation in twenty cities, "one-third of the community action agencies displayed a pattern of target area participation which results in no significant impact on the decisions within the CAA or on other community service organizations. In another third of the cities studied, neighborhood residents were found to


\(^{31}\) Levitan, p. 6.
A crucial problem in meeting the citizen participation requirement was the conflict between poor people's concerns and the concerns of the neighborhoods in which they live. A neighborhood organizer in Oakland identified this key conflict:

When the organizers come in, they canvass everyone—low and middle income alike. Everyone is invited to small block meetings where they hash out a whole range of problems. It is all very democratic, and the poor get outvoted without anyone realizing exactly how it happened. Everyone is encouraged to ventilate their grievances: "The neighborhood children tear up my yard." "I need a job." "The schools are no good." "The police never come when you need them and they are all over you when you don't." "My landlord promised to fix my store when I moved in two years ago but he still hasn't done it." "The street is full of broken glass and the city won't clean it up." "There is no recreation for the kids." Everyone talks about the problems as they see them. Neighbors meet each other, often for the first time, and get a sense of their power and possibilities. There is a strong pull for getting an issue or a project that everyone can agree on, and if someone in the group doesn't pull for this, the organizer does. That is his job. And that is where a major goal of the program goes down the drain.

Only a few people need jobs, not everyone has personal complaints about the school or trouble with his landlord. In the search for an issue on which everyone can agree and take action they end up with the lowest common denominator. Street cleaning or the need for a stop light are not the most pressing problems poor people face but they are the problems that face everyone in the neighborhood: poor and non-poor alike. That is why the group turns to them as issues. It is at this

point that the poor start dropping out. The upshot is that the goals of helping poor people get organized to help solve their problems have been in direct conflict with the goal of organizing neighborhoods so they can solve theirs.\footnote{Kraner, p. 228.}

Scarce resources and unemployment fostered conflict between the concerns of the poor and their neighborhoods and led to "embittered relations between poor neighborhoods and any official source of help."\footnote{Peter Harris and Martin Rein, \textit{Dilemmas of Social Reform} (Chicago: Aldine Publishing Company, 1973), p. 92.}

The problem of inadequate representation on the local community action advisory board was a contributing factor to the poor's negative attitudes regarding their local Community Action Agency. As Lazar suggests, "the representatives of the poor often turned out to be middle-class neighborhood politicians or their carefully selected, docile followers, most of whose identifications were upward bound."\footnote{Irving Lazar, "Which Citizens to Participate in What?" eds. Cahn and Passet, p. 269.} Moynihan also concludes that the problem of inadequate representation on the local community action advisory board led to "maximum feasible misunderstanding" rather than "maximum feasible participation."\footnote{See Moynihan, \textit{Maximum Feasible Misunderstanding}.} A further set of criticisms regarding "maximum feasible participation" in the War on Poverty emanate from more radical assessments of federal programs. In particular, it is
argued that citizen participation does little more than legitimate "governmental action in the United States."³⁷ Even Piven and Cloward, who offer an indictment of both community action programs and model cities, recognize that the opportunity for citizen participation in localities provided an important organizing function and forced harassed city agencies to listen to poor black's concerns. Yet Piven and Cloward also conclude that while the Johnson administration's inclusion of a citizen participation element in the community action programs of the War on Poverty aided ghetto blacks in making local government more responsive to their concerns, they suggest that this was done "to reach, placate, and integrate a turbulent black constituency."³⁸ Piven and Cloward reject Hoynihan's contention that the many goals inherent in the community action programs reflected ineptness during the formulation stage of the policy process. Instead, they argue that these diverse goals were "formulated, broadened, diffused, and multiplied to suit political needs."³⁹ And these public policy elites were responding with the idea of "maximum feasible partici-


³⁸ Piven and Cloward, Regulating the Poor p. 281.

participation* in order to diffuse the tensions which were behind the ghetto riots of the 1960's. In the words of Murray Edelman, citizen participation can be an excellent sample of "politics as symbolic action." 40

In sum, implementation was characterized by a host of problems: vague goals; ambiguously worded legislation; unrealistic burdens being placed on the uneducated and immobilized poor; lack of participation by the poor in board elections; and middle, not lower class representation on the advisory boards. Collectively these conspired to undermine President Johnson's goal of eliminating poverty in America by 1976.41

Yet according to certain scholars, it would be a grave mistake to view citizen participation as an abject failure. Besides merely developing new political structures at the local level, community action programs of the kind created by the EOA of 1964 helped to focus attention on poverty in America. This view is expressed eloquently by Sanford Kravitz:

By focusing attention on doing things in a new way, by involving poor people in programs as participants rather than solely as program beneficiaries, there has been some narrowing of the gap between the poor and the rest of the community.


CAP has proved the catalyst for the development of leadership among those regularly excluded from leadership. Hidden issues, lying dormant for years, have been given visibility.42

To some observers, while many poor became quite disillusioned with the local community action organizations, the poor were better organized and mobilized as a result of the community action program. In his study of how "maximum feasible participation" was implemented in five San Francisco Bay area communities during 1965-1967, Ralph Kramer concludes that it was possible to organize the poor "for relatively short periods of time."43 Stephen Rose echoes Kramer's sentiments by rejecting Moynihan's claim that local programs were dominated by professional militants. Instead, "the existing local organizational network was very involved."44 While Bachrach and Baratz concede some of Moynihan's criticisms, they contend that "maximum feasible participation" has provided the important benefit of raising "the demands of the poor for a significant share in the decision-making process."45 Levitan and Taggart view

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43 Kramer, p. 237.


the "maximum feasible participation" element of the war on poverty as contributing to the program's overall success in moving beyond simple care for the poor in an attempt to alter the economic and social causes of poverty. They flatly reject the idea that Johnson's Great Society package was an abysmal failure and instead argue that citizen participation had an "overwhelmingly beneficial impact."[47]

CITIZEN PARTICIPATION IN MODEL CITIES

The shift from "maximum feasible participation" to citizen participation occurred with the passage of the Demonstration Cities and Metropolitan Act of 1966. With the adoption of this Act, the Johnson administration indicated that the new model cities program had replaced community action as the principal means for dealing with the problems of America's cities. The concentration under Model Cities was on urban renewal and neighborhood blight rather than poverty. President Johnson stated the general purpose of the legislation in his budgetary message during January 1967:

To be effective, concerted attacks on city problems must be planned by the cities themselves. The new model cities program is now the primary incentive provided by the federal government to accomplish this objective. Special grants will


[47] Levitan and Taggart, p. viii.

be made to help transform entire blighted areas into attractive and useful neighborhoods. 49

Interestingly, Johnson’s budgetary statement makes no reference to the war on poverty, community action programs, or community action agencies. Although it is clear that by 1967, the Johnson administration was aware that the "maximum feasible participation" clause of the war on poverty was failing to meet its intended goal, the administration still believed that citizen participation was needed to meet the problems in urban America. As a result, citizen participation was an integral component of the Model Cities program. But unlike the requirement that there be "maximum feasible participation" in community action programs, the emphasis in Model Cities was on "widespread citizen participation" in urban areas. Here words were not at stake. Rather the semantic shift was accompanied by a subtle, but key difference in the citizen participation requirement of the two key programs. Underlying the community action programs was the "theme of opposition to local government and especially local agencies that dealt with the poor," whereas model cities "was intended to create agreement and partnership between residents and city government." 50 As Yates suggests, in Model Cities "city hall would have ultimate

49 Sundquist, Making Federalism Work p. 79.

control of programs and expenditures, and the language of the enabling legislation clearly indicated the more restrained conception of neighborhood participation.\(^{51}\) The requirement of "maximum feasible participation" clearly emphasizes citizen participation more than the Model Cities legislation, which calls for developing a "means of introducing the views of area residents in policymaking."\(^{52}\) Besides providing for a milder version of citizen participation, the Demonstration Cities and Metropolitan Development Act mandated that ultimate control and responsibility of model cities would rest in the hands of the local municipal authority. The City Demonstration Agency was created and defined as "the city, the county, or any local public agency established or designated by the local governing body... to administer the comprehensive city demonstration program."\(^{53}\) The model cities program gave city hall "a tremendous resource for comprehensive, concentrated programming."\(^{54}\) To Melvin Bogulof, "the model cities legislation, with its great emphasis on the role of the city government might be interpreted as a legislative reaction to the style and degree of citizen involvement in the Communi-


\(^{52}\) Yates, p. 21.

\(^{53}\) Frieden and Kaplan, p. 69.

ty Action Program effort."\textsuperscript{55}

When evaluating the implementation of the "widespread citizen participation" requirement, it is important to consider carefully the wording of the legislation itself. Like the notion of "maximum feasible participation" as embodied in the Economic Opportunity Act, the citizen participation requirement in model cities was ambiguous. The Department of Housing and Urban Development left "widespread citizen participation" largely undefined, thus giving interpretive discretion to individual cities. HUD Secretary Robert C. Weaver told Congress that "no precise formula for citizen involvement will be imposed. It will be up to the individual to devise appropriate ways in which citizens will participate."\textsuperscript{56}

Given this philosophy, it is not surprising that a conflict arose between city residents and local government. Frieden and Kaplan contend that "if citizens were invited to participate in the program, how could their role be limited so that the city government would still be firmly in charge?"\textsuperscript{57} As a result, only a few cities had local citizens as members on the CDA's executive committee.\textsuperscript{58}


\textsuperscript{56} Sundquist, \textit{Making Federalism Work} p. 85.

\textsuperscript{57} Frieden and Kaplan, pp. 73-74.

\textsuperscript{58} Frieden and Kaplan, p. 74.
when local citizens do have the opportunity to participate, this often results in frustration. As one resident leader recalled:

What has many in the neighborhood so irritated is that you squander your valuable time in committee meetings and board meetings and neighborhood meetings night after night and get the residents’ views and feed them into the staff and when the document comes out you can hardly recognize any of those ideas in it. 59

The failure to meet the widespread citizen participation requirement is not surprising given the vague and ambiguous wording of the legislation.

But to conclude that the model cities program completely failed to engender any meaningful citizen participation would be to disregard key evidence. Sundquist believes that the city demonstration agencies were somewhat successful in broadening the range of citizen participation. He contends that besides “the residents of the model neighborhoods, the city demonstration agencies had been able to bring into the planning process professional staff representing city and county agencies, public schools and other educational institutions, community action agencies, and a host of social service and other private organizations.” 60 Some believed that there was more meaningful citizen participation in the model cities program than in the community action program of the war on poverty. One neighborhood

59 Sundquist, *Making Federalism Work*

leader argued:

People work together in model cities that wouldn't work together in community action. The welfare family and the family next door that owns its own house are now talking to one another. Model cities has even pulled some new people into community action.61

Despite these few favorable assessments, the majority of the literature regarding model cities and the community action programs of the War on Poverty suggests that the citizen participation goals of each program were not reached. When identifying the reasons why the programs did not reach their goals, we should consider two different perspectives—1) the local ruling elite perspective, and 2) the organizational complexity perspective.62 Each approach offers compelling reasons regarding the inability of federal categorical grant-in-aid programs to reach their intended goals.

According to the local-ruling elite hypothesis, local politics "has been dominated by power structures consisting of bankers and businessmen who together with a few conservative labor leaders and politicians dictate the major contours of local policy."63 But this hypothesis is not completely satisfactory as an explanation for the perceived failure of the Great Society, because community action and

61 Sundquist, p. 104.

62 This distinction follows Paul Peterson, City Limits (Chicago: University of Chicago Press, 1981).

63 Peterson, pp. 86-87.
model cities did mobilize the poor to a certain extent. Yet given the vague nature of the citizen participation requirements, local political leaders were able to use their discretion to impede the meaningful participation of the poor.

The alternative perspective—the organizational complexity perspective—cites the characteristics of our federal system. According to this view, impediments to successful implementation are inherent in a system where local officials must implement legislation to meet goals formulated at the national level. There are numerous public and private agencies at all levels of government, "with overlapping jurisdictions and competing clientele, that must be consulted in the course of implementing government policy."64 These "street level bureaucrats"65 who comprise the public agencies, along with leading members of the business community and other interests can thwart successful policy implementation. In their discussion of the implementation of the EDA program, Pressman and Wildavsky identified the problems of implementing categorical grant-in-aid programs:

What seemed to be a simple program turned out to be a very complex one, involving numerous participants, a host of differing perspectives, and a long and tortuous path of decision points that had to be cleared. Given these characteristics, the chances of completing it at all—were

64 Peterson, pp. 88-89.
The implementation obstacles to successfully meeting the citizen participation requirements of the community action programs and model cities stem from the tremendous discretion accorded the various participants at the local level who were responsible for implementing the programs. The Nixon administration recognized that local autonomy in the implementation of federal programs is desirable in a system of federalism and as a result created New Federalism during the late 1960's and early 1970's.

**Nixon's New Federalism and the Community Development Block Grant Program**

As a response to the perceived failure of the categorical grant-in-aid programs of the Great Society, block grants replaced categorical grants under the New Federalism. The block grant shifted authority over federally funded programs to the states and localities. Under Nixon, discretionary power was given to localities, as funds were distributed by automatic formulas. As Carl Van Horn suggests, Nixon's New Federalism was characterized by the "decentralization of authority to local elected officials, reform through program consolidation, and local accountability for

**Jeffrey L. Pressman and Aaron Wildavsky, Implementation 2nd ed. (Berkeley: University of California Press, 1973), p. 94.**
Enacted in 1972, the centerpiece of Nixon's New Federalism was general revenue sharing. This provided federal "aid to state and local governments with virtually no strings attached to its use." In addition to general revenue sharing, the Comprehensive Employment and Training Act (CETA) was established in 1973 and the Community Development Block Grant (CDBG) program was created in 1974. These block grants consolidated a number of specific programs into one grant "giving local officials more discretion over the kinds of activities to be funded." 

The Community Development Block Grant (CDBG) program was enacted in 1974, and re-enacted with some key changes in the citizen participation element during 1977 and 1982. The CDBG program consolidated a number of Great Society categorical grants, including urban renewal, model cities, open space and historical preservation, and basic water and sewer facilities. As a "compromise between the New Federalism emphasis on local policy-making and the categorical grant approach of federal dominance," the CDBG program had to achieve national objectives with the help of the federal bureaucracy. But the program also provided that local

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67 Van Horn, p. xi.


69 Dommel, p. 2.
officials be "given considerable policy and implementation discretion within the national objectives." President Ford's statement when he signed the Housing and Community Development Act of 1974 into law on August 22, 1974 revealed the compromise between federally controlled categorical grant-in-aid programs and complete decentralization:

In a very real sense this bill will help return power from the banks of the Potomac to the people in their communities. Decisions will be made at the local level. Action will come at the local level. And responsibility for results will be placed squarely where it belongs— at the local level. I pledge that this Administration will administer the program in exactly this way. We will resist temptations to restore the red tape and excessive Federal regulations which this act removes. At the same time, of course, we will not abdicate the Federal government's responsibility to oversee the way the taxpayers' money is used.\(^{71}\)

In order to adequately understand the implementation of the CDBG program, it is important to briefly consider its goals as revealed in the formulation and legitimation stages of the policy process.

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Throughout 1971-1974 the Nixon administration pushed for increased decentralization of federal urban programs. The Senate, however, rejected complete decentralization and in fact wanted more federal control over how localities spent federal money. The House, on the other hand, took a middle position between the Nixon administration and the Senate, "favoring decentralization but with some controls."\(^{72}\) According to Paul Dommel, there were three different issues that had to be confronted by the Nixon administration and Congress:

1) determining the degree of local discretion manifested in defining national objectives and application procedures; 2) reshaping the decision making process, including the roles of federal administrators, local officials, and citizens; and 3) deciding how to allocate the block grant.\(^{73}\)

Three competing legislative proposals were offered to the 93rd Congress in 1973 and each dealt with these community development issues in a different way. The Administration offered the "Better Communities Act," the Senate passed the "Senate Community Development Assistance of 1973," and the House approved the "Housing and Community Development Act of 1973." During House subcommittee testimony regarding the administration's Better Communities Act, Housing and Urban Development Secretary James T. Lynn argued "that local communities are in a better position to set their own

\(^{72}\) Dommel, p. 19.

\(^{73}\) Dommel, p. 27.
community development priorities... than we are at HUD or, with all deference, are you in the Congress."74 Unlike the administration's bill, which stressed the importance of decentralization, the Senate bill stated that the purpose of the legislation was "the development of viable urban communities, through the provision of decent housing, suitable living environments and expansion of economic opportunities, principally for persons of low and moderate income."75 While the Senate bill set specific limits to local discretion,76 the House legislation did not identify any local decision-making constraints and accepted the Senate's interpretation of national objectives. Throughout the debate over the final bill, "the Senate continued to emphasize the concentration of CDBG benefits on low and moderate income groups, whereas the House argued that such


75 Dommel, p. 27.

76 The Senate Committee on Banking, Housing and Urban Affairs identified four specific limits: 1) activities needed to be concentrated in a geographical manner; 2) physical development must be emphasized through the limitation of social service expenditures to 20 percent of the total and they had to be related to specific areas where concentrated development was occurring; 3) 60 percent of the funds must be used for activities that benefit low-and moderate-income residents, to areas that were deteriorating, or to serve a community need that was urgent; and 4) projects of a certain type, including the construction of schools, libraries, hospitals, and city halls were not permitted (Dommel, p. 27).
specificity ran contrary to decentralization and made one national objective more important than others. The final bill that emerged and was signed into law by new President Gerald Ford on August 22, 1974 had major elements of all three proposals within it. As the Nixon administration had requested, there was significant room for implementation discretion within the national objectives. Yet the bill also shared elements of the Senate's concern that the federal bureaucracy should have enough control over the program to attempt to insure that the national objectives were being satisfied in localities. The central goal of the block grant legislation was to insure "that low and moderate-income persons shall be the beneficiaries" of the funds distributed to localities. And in order to meet this goal, citizen participation by residents in localities was included in the legislation. Yet the provision for citizen participation was originally opposed by the Nixon administration.

During 1968, President Nixon revealed a central component of his immanent New Federalism, when he "moved to make citizen participation in model cities more clearly advisory than substantive, thus protecting the authority of the local elected officials." Given the administration's

77 Dommel, p. 29.
78 Rosenfeld, p. 215.
79 Dommel, p. 31.
approach to model cities, it is not surprising that it ignored strict citizen participation requirements in the final version of the Better Communities Act. Speaking before the House Subcommittee on Housing, HUD Secretary Lynn stated the administration's view:

"Put simply, we only seek to require that citizens be informed of community development plans and to ensure that citizen views are considered; we do not believe that there is any national purpose to be served in requiring such views to be expressed or considered in any given manner. Of course, any attempt to evade the basic requirements imposed by the Better Communities Act would result in the withholding of funds." 80

With this view in mind, the final Better Communities proposal mandated "that local officials must publish their development plan sixty days before making it final, giving an opportunity for comments to be submitted by interested groups and persons." 81

Such opinions were not generalized, however. In contrast, Congress called for a more vigorous role by local residents during actual implementation of the housing legislation. The Senate passed a bill that would have required active citizen participation in the implementation of the program. And both the House and the Senate called for public hearings on the block grant application before


81 Dommel, p. 32.
its submission to HUD and an opportunity for citizens to participate in developing the application itself.\textsuperscript{82}

The final version of the citizen participation element of the Housing and Community Development Act of 1974 was a compromise among the various proposals and required that citizens or counties must submit an application which:

1) has provided citizens adequate information concerning the amounts of funds available for proposed community development and housing activities, the range of permissible activities, and applicable program requirements; 2) held at least two public hearings to obtain citizen views on community development and housing needs; and 3) provided citizens an adequate opportunity to participate in the development of the application.\textsuperscript{83}

Each of these requirements worked to promote the accountability of local government to the citizenry. Although the legislation did not indicate the form that citizen participation should take beyond these minimal requirements, it does suggest that the CDBG program application process was designed to give "maximum feasible priority" to low and moderate income persons.

Yet when it came time to implement citizen participation, ambiguous language again thwarted success. A central problem was the discrepancy over the meaning of "maximum feasible priority." Some HUD officials interpreted this as rhetoric, not as a program requirement. Hence, HUD refused

\textsuperscript{82} Dommel, p. 32.

\textsuperscript{83} "Community Development: The Workings of a Federal-Local Block Grant," p. 49.
to actively enforce the notion "that the entire block grant should benefit persons principally of low and moderate income."  

In an attempt to clarify and enforce what they took to be an important requirement, Congress passed The Housing and Community Development Act of 1977 under the leadership of President Jimmy Carter. This new legislation forced HUD to recognize and enforce the low and moderate income requirement of the 1974 legislation. Yet the new legislation did not require localities "to place one particular approach to urban revitalization above all others."  

The new guidelines stated that "maximum feasible priority" is achieved if each funded project passes a newly defined "three pronged test."  

The 1977 legislation also provided for substantial changes in both the formula that HUD uses to award grants and in the citizen participation require-

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84 Rosenfeld, p. 220.

85 Rosenfeld, p. 222.

86 This three pronged test provided that all projects and activities had to 1) principally benefit low and moderate-income persons or 2) assist in the prevention or abolishment of slums and neighborhood blight, or 3) serve other urgent community development needs, Dommel, p. 247.

87 The 1974 grant formula, which was based on population, poverty, and overcrowded housing, favored growing communities that characterized the West and communities that suffered a great amount of poverty such as those in the South. Dommel contends that the weakness of this formula is that it "failed to take into account two important measures of urban distress: loss of population and deteriorating capital infrastructure." As a result, the
ments of the program. In addition to the original minimal requirements of the program, Congress mandated that communities must do the following in order to receive a grant:

- A written citizen participation plan which provides citizens with an opportunity to participate in the development of the application and to submit their views and proposals. It also required that communities provide citizens an opportunity to comment on their community's performance. These requirements specified that processes particularly encourage participation by residents of blighted neighborhoods, minorities, and citizens of low and moderate income.

This new provision, supported by the Carter administration, worked to procedurally strengthen the citizen participation requirements of the CDBG program. Although participation was still only advisory, at least citizen participation priorities were formally recognized. The Fourth Annual Community Development Block Grant Report written by HUD in 1979 offered positive evidence that low and moderate income residents were benefitting from the Carter reforms. It used a sample consisting of 25 of the 40 cities that had experiences with the Carter administration citizen participation changes. The report revealed that low and moderate income persons were more likely to be the recipients of CDBG grants (an increase from 61% in fiscal year 1977 to a

Carter administration proposed formula modifications which included pre-1940 housing (weighted 50 percent), poverty (30 percent), and growth lag (20 percent). Dommel, pp. 253-254.

possible maximum of 73% in FY 1978). As Mary Ann Steger speculates, "the increased representation of low and moderate income residents in the participation process plus the addition of neighborhood-level participation in entitlement communities may have helped to produce this effect."89

But other empirical citizen participation studies suggest that the requirements are not being satisfactorily met in certain cases. While Brookings' studies and HUD's internal reviews have found that statutory requirements for citizen participation are being satisfied, the Advisory Commission on Intergovernmental Relations' survey of CDBG cities and counties found "that a noticeable percentage of cities and counties were not holding the required public hearings."90 In its study of citizen participation in the American political system, the Commission concludes that because CDBG programs were being spread out from low income areas "to encompass a wider but more scattered range of benefits,"91 this is further evidence that the participation of low income groups is not being encouraged in many urban areas. Dommel contends that given the vague wording


91 Ibid., p. 149.
of the legislation and the accompanying discretion provided to local officials, the citizen participation element of the CDBG program works to "enhance the leverage of more affluent residents,"\(^92\) in some localities rather than aiding the low and moderate income residents it was designed to serve. Rosenfeld suggests that the problem of meeting this goal emanates from the lack of a working definition of "low-and-moderate income."\(^93\)

Under the leadership of President Reagan, the Housing and Community Development Act of 1974 was again amended and citizen participation seriously reduced. Given Reagan's campaign for reducing government intervention and control, this is hardly surprising. His reforms include these basic requirements for grantees:

a) Furnish citizens information concerning the amount of funds available for proposed community development and housing activities and the range of activities that may be undertaken; b) Publish a proposed statement in such manner to afford affected citizens an opportunity to examine its content and to submit comments to the grantee on the proposed statement and on the community development performance of the grantee; c) Hold one or more public hearings to obtain the views of citizens on community development and housing needs; and d) Consider any such comments and views on preparing the statement and may, if deemed appropriate by the grantee, modify the proposed statement; and make the final statement available to the public.\(^94\)

\(^92\) Dommel, p. 229.

\(^93\) Rosenfeld, p. 214.

Other changes include: the removal of the grant application and front-end review requirements, different standards for funding public services, permitting planning activities and assistance to private business provided that these support eligible economic development projects, and the elimination of restrictions on public facilities improvement activities.\(^95\) As Dommel concludes, the various changes in the CDBG program requirements suggest that "the legislative language of the CDBG is sufficiently broad to allow a new set of policy preferences to be adopted without any change in the law itself.\(^96\)

Yet it is the broad nature of the legislative language that has led to severe implementation problems. Besides the previously discussed citizen participation implementation problems, a set of implementation obstacles arises from the fact that the CDBG program consolidated a number of categorical grants, including urban renewal, model cities, open space and historical preservation, and basic water and sewer facilities. The Advisory Commission on Intergovernmental Relations contends that because community development has been used in a sweeping fashion "to describe a plethora of programs and policies bent upon rebuilding and preserving the nation's urban areas, and

\(^95\) Steger, p. 11.

\(^96\) Dommel, p. 260.
improving the lives of the residents therein," it has been a key factor fostering local implementation problems. Rosenfeld believes that the key to understanding the implementation problems of the CDBG program is to realize that the legislation contains three basic orientations to urban revitalization, two of which are in direct conflict with the goal that low-income persons will benefit. The differing orientations are "central city commercial and industrial development," attracting middle-income residents back to the central city to live, and improving low-income residential environments both physically and socially. To Rosenfeld, the implementation problems of the CDBG program emanate from the inability to deal successfully with this difficult question: "Can the CDBG program offer all three approaches to urban revitalization and operate in a decentralized manner consistent with its New Federalism roots, and still principally benefit low- and moderate-income persons?" As Rosenfeld concludes, "the inclusion of a national objective principally to benefit low-and-moderate income persons inherently limits the implementation strategies available to localities.

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97 Advisory Commission on Intergovernmental Relations, Community Development: The Workings of a Federal-Local Block Grant p. 1.

98 Rosenfeld, p. 212.

99 Rosenfeld, p. 213.

100 Rosenfeld, p. 231.
A third major factor contributing to poor implementation of the CDBG program has been the federal-local nature of the program. Given the conflicting national objectives of the CDBG program, it is not surprising that this has resulted in "maximum feasible flexibility" for HUD officials when interpreting the legislation. Dommel suggests that "unlike general revenue sharing, the CDBG program included several generally stated but substantive national policy goals, which if pursued with any aggressiveness at the national level, were likely to bring federal program administrators into conflict with those giving priority to decentralization." This conflict is reflected in the distribution of program funds to localities. The CDBG legislation provides that cities with a population of over 50,000 people and specific counties over 200,000 can apply for CDBG funds, and all other units of general local government are eligible for funds on a discretionary basis. Usage of the funds falls under the domain of the locality as long as its selected uses fall within the specified program parameters. As the Advisory Commission on Intergovernmental Relations suggests, the implementation problem here occurs when a city or county is operat-

101 Rosenfeld, p. 225.
102 Dommel, p. 259.
103 The Workings of a Federal-Local Block Grant p. 1.
ing under the imperatives of resource scarcity, and as a result can only pursue a few of the program objectives. Consequently, "the individual local programs often become a mere fragment of the comprehensive program envisioned."105

A key goal of this dissertation research is to provide a longitudinal analysis of the impact of the changing citizen participation and program requirements on the overall implementation of the CDBG program under Presidents' Ford, Carter, and Reagan in Columbus, Ohio. In order to achieve this goal satisfactorily, it is necessary to examine the Columbus implementation environment in detail. Chapter three provides an intensive discussion of the local political climate and key actors involved in the implementation of the CDBG program. It also offers an historical sketch of the implementation of the CDBG program since its inception in 1974 and evaluates the implementation of citizen participation.

Chapter III

THE COLUMBUS IMPLEMENTATION CONTEXT

In order to understand fully the implementation of a federal program in an urban area, the local political climate and patterns of bias that exist in decision making must be examined.106 Recent urban politics literature also reveals the importance of considering the city not merely as an autonomous decision making unit, but as a part of a larger political and economic system emphasizing certain values and goals, most notably the politics of privatism.107 And finally, as another group of urban experts argue, the crisis of the city emanates from two fundamental problems—the inability of urban areas to implement successfully federal programs given the fragmentation that characterizes service delivery, and the lack of meaningful citizen input that is needed to combat the politics of priv-

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106 See John J. Harrigan, Political Change in the Metropo-

lis (Boston: Little Brown and Company, 1981), 2nd edi-
tion.

107 See Dennis Judd's, Private Power and Public Policy (Boston: Little, Brown and Company, 1979), and Sam Bass Warner's The Urban Wilderness (New York: Harper and Row, 1982) for excellent discussions of this the-
sis.

- 54 -
The central goal of this chapter is to provide a detailed examination of the political and economic context for the implementation of the CDBG program in Columbus. The characteristics of the local political environment and the extent to which it affects the implementation process are considered. The following questions are addressed:

1. Who have been the key actors in the implementation of the CDBG program in Columbus? What roles have each of these actors played?

2. Historically, what have been the sources of conflict in the implementation of the CDBG program? What actors have been involved in these conflicts and what motivated these actors to enter into the process?

3. Since the inception of the CDBG program in 1974, what have been the implementation problems in Columbus?

4. How has the citizen participation element of the CDBG program been implemented in Columbus? How do citizen participation requirements in Columbus compare to other localities receiving CDBG funds?

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5. Since the creation of the CDBG program in 1974, what types of projects have received funding in Columbus?

Which areas in Columbus have received CDBG funding?

THE KEY ACTORS IN THE COLUMBUS CDBG IMPLEMENTATION PROCESS

The Department of Development

With the passage of the Housing and Community Development Act of 1974, Columbus mayor Tom Moody instructed the Department of Development to conduct the planning and implementation needed to insure that Columbus would receive CDBG funds. The Development Department applies to HUD for community development funds on a yearly basis, and is ultimately responsible for creating an application that "consists of a three year Community Development Plan, a one year Community Development Program, a one year Community Development Budget, and a Housing Assistance Plan (HAP)."109 It also has the important responsibility of formulating the Columbus Development Strategy, a "plan which identifies the City's present conditions, needs and major problems, especially for citizens of low and moderate income, and establishes objectives, policies, and standards to guide the development and implementation of a plan for action."110 Because the Development Department must con-

109 Columbus Department of Development, Third Year Community Development Plan (Columbus: Department of Development), August 1977, p. 1.
struct this community development strategy, it employs a professional staff that collects relevant data regarding Columbus neighborhoods to present to City Council and the Community Development Task Force. The Department of Development is comprised of five different divisions all of which aid in the implementation of the CDBG program.

The Community Development Task Force

A subcommittee of the Housing Advisory Committee, the CD Task Force was created in 1978 to be the formal citizen participation mechanism in the application process for CDBG funds, in the implementation of the Columbus CDBG program, and in the evaluation and monitoring of the program. In 1983 the Task Force was comprised of twenty six regular

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110 Columbus Department of Development, Community Development Citizen Participation Plan (Columbus: Department of Development), March 31, 1983, p. 12.

111 The Development Department consists of the divisions of Building Regulations, Code Enforcement, Economic Development, Planning, and Community Development. According to an information packet provided by the mayor's office regarding the structure of city government, both the Divisions of Planning and Community Development have responsibilities with respect to the overall implementation of the CDBG program in Columbus. The Division of Planning is responsible for formulating planning objectives and coordinating specific development projects, including projects funded by CDBG grants. But the main responsibility for the overall implementation of the CDBG program is the Division of Community Development, whose primary objective "is the development of a viable community including decent housing, a suitable living environment and expanding economic opportunities, principally for persons of low-and-moderate-income." Mayor Tom Mooney, Columbus, Ohio (Columbus: The Mayor's Office, 1983).
members and eighteen alternate members representing twenty three different Columbus areas.¹⁷²

Members are selected by the Department of Development and approved by remaining Task Force representatives. The positions are not elected positions although individuals appointed to the Task Force are generally active in community and neighborhood affairs, often serving on their neighborhood commissions. Membership on the Task Force is guided by the following regulations:

1. two members from each target area not covered by a participating commission in the revitalization/stabilization area,

2. one member from each area commission in the revitalization/stabilization area that wishes to participate,

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¹⁷² Areas represented on the 1983 Task Force include West Broad Neighborhood Commercial Revitalization Strip, Franklinton Area Commission, Hilltop Area Commission, Reeb/Hosack, Hungarian Village Special Improvement Area, South Parsons NCR Strip, Olde Towne East, Near East Area Commission, Driving Park Area Commission, Mt. Vernon Special Improvement Area, Mt. Vernon NCR Strip, Harrison West, Victorian Village Area Commission, Italian Village, Italian Village Area Commission, North High NCR Strip, Milo/Crogan Special Improvement Area, University Area Commission, South Linden, North-East Area Commission, Clintonville Area Commission, Fifth-to-King, and North Linden, Columbus Department of Development, Community Development Citizen Participation Plan (Columbus: Department of Development), March 31, 1983, pp. 19-22.
3. one member from each target area covered by a participating commission,

4. one member from each existing Neighborhood Commercial Revitalization strip,

5. one member from each special improvement area,

6. one additional member from the Chairman's organization, as the Chairman is non-voting except in a tie situation,

7. any additional member who is recommended by the Department of Development, meets the membership mandate and is approved by the Task Force.  

The CD Task Force is guided by a membership mandate that requires the "involvement of low-and moderate-income persons, of minority groups, residents of areas where a significant amount of activity is proposed or ongoing, the elderly, the handicapped, the business community, and civic groups who are concerned about the program."  

Since its creation in 1978, the CD Task Force has been an active participant in Columbus CDBG proceedings. It is responsible for reviewing and commenting on the planning that is necessary for the writing of the Community Development Plan, program, and application. The Task Force also has the


114 "Community Development Citizen Participation Plan," p. 17.
important responsibility of monitoring and evaluating the implementation of the CDBG program in Columbus. Fulfilling its organizing and communication role, the CD Task Force is responsible for disseminating the results of Task Force discussions and general community development information to neighborhood groups and insuring that appropriate groups and organizations are summoned to present relevant community information. During the ninth year planning process, the CD Task Force held seven meetings in this important role. Finally, members on the Task Force "review all amendments and changes to the Community Development Plan and Program that have a city-wide significance," and perform the important function of communicating and recommending to the Columbus Development Commission, City Council, the Mayor and relevant city departments.115 The Task Force is merely an advisory body and as a result, has input into the decisions regarding what areas of the city and which programs should receive CDBG funds. While the CD Task Force does play an advisory function, it is a reactive body to the extent that it responds to the Department of Development's recommendations. The role of the Task Force and the extent to which it is an effective vehicle for citizen participation will be evaluated critically in chapter five.

115 "Community Development Citizen Participation Plan," p. 17.
The Mayor

As mayor of Columbus, Tom Moody had the important responsibility of appointing key Development Department officials, who play the vital role of presenting CDBG funding recommendations to the CD Task Force and City Council. Personal interviews conducted with bureaucrats, citizen group members, and city council members and their aides, confirmed that Mayor Moody has displayed the same inactive stance regarding CDBG that has generally characterized his tenure as mayor of Columbus. Moody's views regarding the CDBG program are reflected in the decisions of the Department of Development. Of the four mayoral styles identified by Yates, Tom Moody's approach to his job best qualifies him for the role of "the broker" because he possesses "rel-

Yates identifies four different mayoral styles: the crusader, the entrepreneur, the boss, and the broker. A mayor who adheres to the crusader style of leadership "possesses weak political and financial resources but ... exhibits a strong desire to solve urban problems and produce significant policy innovations. The crusader emphasizes a symbolic politics and crisis management because he does not have the resources to govern and control the city consistently through the force of political or financial clout." Former New York mayor John Lindsay practiced the crusader style of leadership. A mayor who is an entrepreneur "possesses strong political and/or fiscal resources and ... also takes a strongly activist posture towards urban policy making." According to Yates, Richard Lee of New Haven adhered to this style of leadership. The Boss is that "mayor who possesses strong political and/or fiscal resources but who assumes a passive attitude toward urban problem solving." Yates cites former Chicago mayor Richard Daley as representing this style of leadership, Douglas Yates, The Ungovernable City: The Politics of Urban Problems and Policy Making (Cambridge, Massachusetts: MIT Press, 1977), pp. 146-147.
ively weak political and/or fiscal resources" and
assumes a passive role in urban policy making." According
to Yates, "the broker accepts the limitations of his power
and seeks to keep peace in the city by carefully balancing
and adjusting conflicts, demands, and interests." The
broker role played by Mayor Moody is reinforced by the com-
ment of a key city council aide, who complained that "the
mayor exerts no leadership" in the implementation of the
CDBG program. According to this aide, Development Depart-
ment Director Ralph Smithers "has a great deal of freedom,
and while he does a good job and is a good administrator,
the mayor's office must get more involved." A number of
bureaucrats and interest group members expressed the belief
that regardless of who is elected mayor in the fall 1983
election, there will be a different style of mayoral lead-
ership emanating from city hall.

The City Council

While the mayor is the executive officer and is elected
every four years, the city council is the legislative body
and its seven members are elected at large to four year
terms at two year intervals. A number of urban experts
have written about the impact of ward versus at large city
council representation and the effects on elections.

117 Yates, pp. 146-147.

118 Personal interview, Columbus, Ohio, June 30, 1983.
responsiveness, and public policy decisions. Lineberry and Sharkansky contend that ward representation often increases the number of lower class groups and minorities serving on city council.\textsuperscript{119} They also suggest that under the ward system, city council members "tend to look after their constituencies' desires for paved streets, parks, school facilities, and other tangible outputs of municipal government."\textsuperscript{120} Banfield and Wilson believe that under the ward system, there is a greater number of access points provided to the citizen who wishes to influence city council decisions, and the greater the chance for conflict given the wider dispersal of power.\textsuperscript{121}

In the constituency at large representation, a council member will be less likely to consider material gains for a specific area of the city. A representative elected at large can be more concerned with focusing on "broad social, economic, or political interests, rather than binding himself or herself to geographical interests."\textsuperscript{122} Proponents of the at-large system argue that its greatest virtue is "that it theoretically gives all councilmen the same con-


\textsuperscript{120} Lineberry and Sharkansky, p. 190

\textsuperscript{121} Edward C. Banfield and James Q. Wilson, \textit{City Politics} (Boston: Harvard University Press, 1963), pp. 90-91.

\textsuperscript{122} Lineberry and Sharkansky, p. 190.
A member of city council must consider the interests of the entire community because he needs a wider range of votes for re-election.

With respect to the implementation of the CDBG program in Columbus, the at-large city council plays a vital role because it makes the final decision regarding the CD application submitted to HUD. The council members can revise any of the recommendations offered by the Department of Development and the CD Task Force. Chapter four will critically evaluate the role of the city council in the implementation of the CDBG program in Columbus and consider the strengths and weaknesses of the at-large system of representation in light of this implementation process.

Interest Groups and Neighborhood Groups

While the Mayor, Department of Development, Citizen's Advisory Task Force, and City Council, all play formal roles in the implementation of the CDBG program in Columbus, interest groups and neighborhood organizations have little formal input into the grant application and target area selection process. Despite this lack of formal input, interest and neighborhood group concerns are heard throughout the implementation process. Members of these organizations attend city-wide hearings and neighborhood meetings, and contact the mayor, Department of Development bureau-

123 Banfield and Wilson, p. 94.
crats, members of the CD Task Force and city council, in an effort to have their views reflected in policy decisions regarding the distribution of CDBG program benefits. Department of Development Director Ralph W. Smithers has indicated that successful citizen participation is often achieved by linking individual concerns with an interest or community group.124

Through the years, a number of interest and neighborhood groups have been particularly active in the CDBG grant application process. The Columbus Chamber of Commerce has played an active role in insuring that CDBG grant money is spent to create a more viable economic base. Some have argued that the Columbus Chamber of Commerce has had a disproportionate impact on the overall distribution of program benefits when compared to other organizations. This point will be examined more fully when the 1983 implementation process is carefully considered in chapter four.

Other interest groups that have been actively involved in the grant application process include the Urban League, Ohio Public Interest Campaign and ACORN (Association of Community Organizations for Reform Now). Citywide groups have traditionally represented the concerns of low and moderate income residents.

124 Personal Interview, Columbus, Ohio, August 23, 1983.
Neighborhood groups such as Southside United Neighbors, Godman Guild, and Friends of Shiloh Park have been effective vehicles for mobilizing citizens to become involved in the grant application process. Representing various areas of Columbus, these groups have worked to organize citizens to lobby for funds in their neighborhoods. The role of interest and neighborhood groups will be examined in chapters four and five when the overall implementation of the CDBG program and the extent to which citizen participation has made a difference in the distribution of program benefits is considered.

A Historical Examination of CDBG in Columbus

The implementation of the CDBG program in Columbus was initiated in August 1975 and the first full year of its operation was 1976. Almost immediately Columbus identified a number of broad policy goals to guide the implementation process. The 1974 Housing and Community Development Act identified the primary national goal as "the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income."125 Prior to this broad objective, the act identifies seven specific objectives:

125 The Housing and Community Development Act of 1974 Section 101(c).
the elimination and prevention of slums and blight; the elimination of detrimental conditions; the conservation and expansion of the housing stock; the improvement and expansion of the quantity and quality of community services; more rational utilization of land resources and better arrangement of activity centers; the reduction of the isolation of income groups; and the historic or esthetic restoration of property.  

Following the 1974 act, the Columbus Department of Development asserted that CDBG "monies are for the support of comprehensive planned and coordinated development activities directed toward these objectives:"

1. to eliminate blight and prevent deterioration of property and community facilities,
2. to eliminate conditions detrimental to health, safety and public welfare,
3. to conserve and expand the housing stock,
4. to expand and improve community services,
5. to more rationally utilize land and other natural resources,
6. to reduce the isolation of income groups within communities, and promote an increase in diversity and vitality of neighborhoods.

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As the policy implementation literature suggests, the issue of goal clarity is often a key factor in the perception of the overall success or failure of the implementation of a federal program at the local level. The extent to which the goals of the CDBG program affected the overall implementation of the program will be examined critically in chapter four.

In order to reach the goals identified above, Columbus began to formulate a three-year Community Development Plan in 1975. This plan, required by the federal legislation, is a three-year plan and one-year program with the primary objective of developing viable urban communities principally for persons of low and moderate income, by providing 1) decent housing, 2) a suitable living environment, and 3) expanded economic opportunities. Discussions regarding the submission of revised three-year plans were held by the Development Department, the City Council, the CD Task Force, and interested citizens in 1977, 1980, and 1983.

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A required component of each of these three year plans is the Housing Assistance Plan, which "is designed to provide a framework for local governments to establish guidelines for proposed Federally assisted in their areas." According to the Housing and Community Development Act of 1977, localities must adhere to the following rules when preparing their Housing Assistance Plans:

1. survey and document the condition of the local housing stock,
2. assess the need for housing, especially for lower income families,
3. state local goals which relate both to reducing negative housing conditions and to meeting the needs of lower income families, and indicate general locations for proposed assisted housing based on local conditions and needs.

While the Development Department uses quantitative measures to ascertain housing conditions and needs, it stresses the importance of acquiring federal funds to aid low income families "who have the greatest difficulty funding suitable housing within their financial capabilities."

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132 Columbus Department of Development, Approved First and Second Year Community Development Program (Columbus: Department of Development, Revised January 1977), p.
A number of citywide and area specific programs have been implemented in order to reach the goals articulated in the Community Development Plan and Housing Assistance Plan. These programs include the Urban Homesteading program, the Spot Demolition program, and the Columbus Residential Rehabilitation Assistance program. The Urban Homesteading and the Spot Demolition programs are the principal city programs designed to eliminate and prevent slums and blight. The Urban Homesteading program "acquires selected properties which it offers to prospective homesteaders for one dollar provided they carry out required structural repairs and live in the structure for a minimum of four years."133 The Spot Demolition program has been used to demolish existing structures "when their dilapidated condition constitutes a danger to the public and adversely affects surrounding property."134 The city's Building Code, Housing Code and Nuisance Abatement Ordinance is applied under the Spot Demolition program.

While the Urban Homesteading and Spot Demolition programs are funded on a citywide basis, the Environmental Code Enforcement and the Columbus Residential Rehabilitation Assistance programs are applied in specific program or


134 N. Jack Huddles, Third Year Community Development Plan (Columbus: Department of Development, August 1977), p. 35.
target areas chosen to receive CDBG funds. The Environmental Code Enforcement program offers residents in chosen areas the opportunity to improve their surrounding environments by receiving funds for weed control, cleaning up trash and debris, and dealing with junk cars. Like the Environmental Code Enforcement program, the Columbus Residential Rehabilitation Assistance program is designated by the Department of Development, CD Task Force, and City Council to be applied in a small number of chosen areas. Designed to improve housing conditions in low and moderate income neighborhoods, this program was established in 1975. The program provides owners of properties containing one to four dwelling units with financial assistance, such as conventional, deferred, low interest, or forgiveness loans and other rehabilitation services."135

With the passage of the Housing and Community Development Act of 1974, many of the programs created under Model Cities were effectively terminated. But the Act did provide that localities could gradually cut back funding "for certain programs that have been proven and are currently providing necessary community services."136 The Department of Development recommended that $2.4 million in transitional funding be allocated out of the twenty-six million CDBG


136 Recommended Columbus Community Development Plan p. 42.
dollars granted to Columbus over the initial three year period. The Model Cities program was phased out during this period as $1.6 million was allocated during the first year and $.8 million was granted to Model Cities programs for the second program year.\textsuperscript{137}

The remainder of this section will offer a detailed description regarding the distribution of CDBG program benefits from 1975 through 1983. Program areas will be identified and the rationale for the switch to target areas will be explained. The allocation of funds to specific programs from year to year will offer empirical evidence regarding whether Columbus' CDBG program is meeting the needs of low and moderate income residents.

Since 1975, some $73 million in CDBG monies have been allocated to Columbus. The yearly breakdown of grant money is revealed in table one.

Table 1

<table>
<thead>
<tr>
<th>Year</th>
<th>Millions of Dollars</th>
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<tbody>
<tr>
<td>1975</td>
<td>9,194,000</td>
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<tr>
<td>1976</td>
<td>8,376,000</td>
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<tr>
<td>1977</td>
<td>8,554,078</td>
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<tr>
<td>1978</td>
<td>8,691,000</td>
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<tr>
<td>1979</td>
<td>9,289,000</td>
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<tr>
<td>1980</td>
<td>11,781,727</td>
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<tr>
<td>1981</td>
<td>9,462,000</td>
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<tr>
<td>1982</td>
<td>8,257,000</td>
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<tr>
<td>1983</td>
<td>8,787,000</td>
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</tbody>
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\textsuperscript{137} \textit{Recommended Columbus Community Development Plan} p. 42.
Under the first three year plan, implemented in 1975, eight broad program areas were approved by the city council largely upon the recommendation of the Department of Development and to a lesser extent the citizenry. According to Development Department documents and personal interviews, "program areas were defined based on the type of need (revitalization, stabilization, maintenance and direction)\textsuperscript{138} the existence and boundaries of community groups and the existence of natural boundaries."\textsuperscript{139} The eight program areas selected for the first three year plan were South Linden, Near North, Near East, Near South, Franklinton, Stelzer/Cassidy, University/Clintonville, and North Linden. The Department of Development used its own formula in order to allocate CDBG money to each of the eight program areas in an equitable manner. The formula was derived by taking the total number of residents in each of the program areas "as a percent of the total number of residents in all of the program areas." Two other formulae were used in order to verify the results. Development Department officials employed the Department of Housing and Urban

\textsuperscript{138} Revitalization areas are characterized as "dilapidated areas which are extensively blighted," while stabilization areas "are in a state of decline or deterioration." Maintenance areas refer to areas of stability "which do not require major improvements," and direction areas are "new or emerging areas." \textit{Third Year Community Development Plan} p. 7.

\textsuperscript{139} \textit{The Recommended Columbus Community Development Plan} p. 38.
Development's formula for allocating funds to cities and this "was based on the number of residents living in the program areas that are low-moderate income as a percent of the total low-moderate income residents of the total of the program areas." The Department of Development justified its rationale for the selection of the eight program areas in a public document:

The concentration of community development activities within the eight Program Areas is directed towards the revitalization of the City's most deteriorated areas. Revitalization of these areas should reduce the isolation of income groups and promote increased diversity through the attraction of persons of different income and racial characteristics. The long-range impact of the CDBG Program should produce neighborhoods with less income and racial stratification.

The Department of Development claimed that the chosen program areas contained "the greatest concentration of low and moderate income and minority households within the City of Columbus." To support this assertion, the Development Department cited income numbers based on the 1970 census. The eight program areas contained 43.5% low and moderate income residents and 73.1% minority households, while the entire City of Columbus contained 37.08% and 17.05% respectively. The working definition of low and moderate income used by the Development Department is "persons with

140 The Recommended Columbus Community Development Plan p. 44.
141 Third Year Community Development Plan p. 16.
142 Third Year Community Development Plan p. 16.
income less than 80% of the City median income according to the 1970 census.**143

The Development Department implemented four citywide programs in order to address the nationally legislated goals of aiding low and moderate income individuals and eliminating slums and blight. These programs included Urban Homesteading, Equal Opportunity Services, Minority Business Development, and Fair Housing Services. Chore Corps and Environmental Code Enforcement were implemented in chosen program areas.**144

As a direct result of the Housing and Community Development Act of 1977, the Development Department switched from using broad program areas to the more narrowly focused target areas when distributing CDBG funds. The move to target areas was based on the notion that smaller, more manageable target areas will maximize the overall impact of CDBG funding in selected areas of Columbus.**145 Although the use of target areas permits the Development Department to concentrate CDBG funds in order to improve visibly smaller areas of the city, the target area approach also works to limit

**143 Columbus Department of Development, Recommended Second Year Community Development Plan (Columbus: Department of Development, February 1976), p. ii.

**144 Columbus Department of Development, Approved First and Second Year Community Development Program (Columbus: Department of Development, revised January 1977), p. 1.

**145 Columbus Department of Development, Neighborhood Strategy Area (Columbus: Department of Development, May 26, 1978).
the number of areas receiving assistance. One city council aide suggested that a key weakness of the target area approach is that "some people and needy areas don't get the money that is needed to improve their homes and community." Yet a senior bureaucrat contends that the city council wanted a shift to target areas "because from a political standpoint, it is more difficult to see the impact of funds in larger program areas than target areas."

With the change from program areas to target areas in 1978, the Development Department had to formulate a three year CDBG plan based on the idea that CDBG funds would be distributed in more limited areas. Six target areas were selected to receive CDBG funding from 1978 through 1983: South Linden, Olde Towne East, Reeb/Hosack, North of Broad, Fifth/King, and Italian Village. Five additional areas, including Unity, Milo-Grogan, Harrison West, Bellows and Hungarian Village, were chosen to be special improvement areas. A special improvement area "receives a limited amount of funding to help alleviate certain housing and/or environmental problems."

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146 Personal interview, Columbus, Ohio, June 30, 1983.
147 Personal interview, Columbus, Ohio, September 14, 1983.
148 Columbus Department of Development, Approved Sixth Year CDBG Budget April 1980.
149 Columbus Department of Development, Community Development Citizen Participation Plan (Columbus: Department
The six target areas and five special improvement areas received systematic assistance under CDBG funding through 1983. Programs created to aid target areas and "act as stabilizing influences in the inner-city of Columbus include the Emergency Repair Fund, Self-Help Program, Chores Program, Nuisance Abatement Fund, and Environmental Blight Abatement Program." These programs were designed to provide limited housing rehabilitation assistance and "also address environmental concerns which contribute to an area's decline." As the 1983 grantee performance report suggests, "it is anticipated that sufficient resources are available to totally complete the six existing target areas and initiate work in four new areas."150 The factors accounting for the selection of these four new target areas and the implementation of the Community Development Plan will be described in detail in chapters four and five.

**CONFLICT AND CONTROVERSY: IMPLEMENTING CDBG IN COLUMBUS**

Throughout the implementation process, bureaucrats have dealt with a number of implementation problems. Underlying the overall implementation of the program has been the key problem of inadequate resources to meet the demands of the Columbus citizenry. As numerous bureaucrats pointed out in

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150 Ralph W. Smithers, *Grantee Performance Report: Community Development Block Grant Program* (Columbus: Department of Development, July 31, 1983), p. 3.
personal interviews, eight to nine million dollars in CDBG funds just will not adequately deal with the housing, community, and environmental problems prevalent in certain areas of Columbus. When asked the question, "are there problems in implementing the CDBG program in Columbus?" one bureaucrat responded that the key implementation problem is that "the federal money allocated to Columbus is a pittance to the needs." 151

Compounding the resource scarcity problem is the feeling among various community groups, politicians, and citizens that the CDBG program should have a major impact on improving low and moderate income residents' homes and surrounding communities. "Gross overexpectation," according to one bureaucrat, has led to much conflict between citizen groups and the Department of Development through the years. The key issue of resource scarcity and its impact upon the implementation of the CDBG program in Columbus during this program year will be addressed more fully in chapter four.

In the early years, the program was plagued by slow implementation. Members of the CD Task Force, City Council, Department of Development officials, and newspaper accounts all suggest that the city was ill equipped to implement the CDBG program in an efficient manner. This lack of expertise on the part of Development Department staff resulted in program areas and target areas having to

151 Personal interview, Columbus, Ohio, May 25, 1983.
wait for CDBG grants. One senior bureaucrat contends that "in the first years of the program, they were appallingly inefficient in spending money. We are not prepared to implement large amounts of money." This slow implementation has been a source of conflict between Development Department officials and Columbus residents. In March 1980, a city hearing was held to present Development Department plans regarding the upcoming program year. Angry residents attending the hearing "complained that they are still waiting for the low-interest loans and grants from previous years." According to a city council aide, $6 million from the 1978 and 1979 housing rehabilitation programs remains unspent.

When the Development Department has been able to allocate CDBG funds in the form of grants to rehabilitate homes in program and target areas, the Department has often contracted with individuals who do poor work and who charge excess money for the work that is actually accomplished. The problem of unreliable and dishonest contractors has plagued the implementation of the CDBG program from the outset. One community activist contends that the problem is compounded because "there is no appeal process for shoddy work."

152 Personal interview, Columbus, Ohio, June 30, 1983.

153 Lee Stratton, "Improvement Funds Sought in Inner City," Columbus Dispatch March 13, 1980, p. 1B.
These implementation problems and the prospects for improving the overall implementation of the CDBG program in Columbus will be studied more fully in the next chapter. Specifically, chapter four will address in detail the implementation problems that have characterized the process this year. The empirical results of interviews with Development Department bureaucrats, CD Task Force members, city council members, community representatives and direct participant observations during city hearings regarding the ninth program year will be described.

**THE EVOLUTION OF CITIZEN PARTICIPATION IN THE CDBG PROGRAM**

With the passage of the Housing and Community Development Act of 1974, the Columbus Department of Development established a citizen participation process that has undergone several significant changes, most notably the creation of the Citizen Advisory Task Force in 1978. According to Department of Development "Grantee Performance Reports," the Department's philosophy regarding citizen participation is that "we will meet with anyone, at any time and at any place to develop the Community Development plan."\(^{155}\) Citizen participation in the implementation of the CDBG program can occur during the planning stages regarding how to use

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\(^{154}\) Personal interview, Columbus, Ohio, August 23, 1983.

CDBG funds, in the decision-making process regarding where to use CDBG funds, and the monitoring and evaluation of the overall effectiveness of the CDBG program. This section will describe the various ways in which Columbus has implemented citizen participation in the CDBG program, while chapter four will critically evaluate whether Columbus has formulated an effective citizen participation mechanism. In order to understand fully the implementation of citizen participation in Columbus during the ninth year of the CDBG process, it is necessary to identify how citizen participation has evolved through the years.

When Congress passed the Community Development Block Grant Program in 1974, it required that cities and counties applying for CDBG funds must afford citizens the opportunity to participate in the grant application process. As a result of the 1974 act, the Department of Housing and Urban Development established the following citizen participation requirements for CDBG applicants:

(i) Provide citizens with adequate information concerning the amount of funds available for proposed community development and housing activities, the range of activities that may be undertaken, and other important program requirements; (ii) Held at least two public hearings to obtain the views of citizens on community development and housing needs; and (iii) Provided citizens an adequate opportunity to articulate needs, express

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preferences about proposed activities, assist in the selection of priorities, and otherwise participate in the development of the application.\textsuperscript{157}

In order to satisfy the federal citizen participation requirements, the Department of Development organized seven citizens' forums which were designed as "the means for promoting public understanding and citizen involvement in the Community Development Planning Process."\textsuperscript{158} Beginning September 25 and ending December 18, 1974, the forums discussed the following topics: "Introduction to the Housing and Community Development Act of 1974," "Goals and Strategies for Columbus," two successive meetings addressing "Citizens' Views of Needs: An Opportunity for Citizens to Present Individual Neighborhood Needs," "Review of Needs and Available Resources," "Presentation and Review of Preliminary Plan," and "Presentation and Review of Recommended Plan." During the first year of the implementation of the CDBG program in Columbus, "citizens were involved in the identification of needs, development of the conceptual approach/strategy of community development, goals, objectives, definition of program areas and allocation of

\textsuperscript{157} \textit{W. Jack Huddle, Third Year Community Development Plan (Columbus: Department of Development, August 1977)}, p. 44.

\textsuperscript{158} \textit{The Recommended Columbus Community Development Plan: 1975-1978} p. 5.

\textsuperscript{159} Columbus Department of Development, \textit{Grantee Performance}
Once eight program areas were selected, the Department of Development held 77 community meetings in the areas selected for CDBG funding. In an effort to identify the needs of the individual program areas and develop specific strategies to meet those needs, Department of Development staff worked actively with interested neighborhood residents. With professional assistance from Development Department staff, citizens received a number of programs and projects that could work to implement "the community based development strategy." In the grantee performance report submitted to HUD the Columbus Department of Development described how citizen participation was implemented in each of the eight program areas:

Community residents in some areas formed committees for site selection, program development, and design of facilities. The end result was a plan that professionally could have had more impact but was tailored to the citizen perception of need and action. It would be correct to say that all program area projects and programs were developed with the citizens and that citizen participation was implemented in each of the eight program areas:


Eight program areas were selected by the Department of Development to be recipients of CDBG funds based on the following sources of information: 1) Citizens' Forum Interests, 2) Capital Improvements Hearings, 3) Current Community Development Planning Information including 1974 changes in assessed value, 1970 information of Housing and Population characteristics, and population and housing projections to 1985, 4) the recommendations and data of the Community Renewal Program and the Neighborhood Development Program, 5) analysis of area plan recommendations, and the 6) input of city agencies. The Recommended Columbus Community Development Plan: 1975—pp. 8-9.
participation was a significant element in the outcome. In addition to the Citizen Forums and program area neighborhood meetings, the Development Department created two advisory committees that were designed to aid in the first and second year planning activities. The Technical Review Committee (TRC), comprised of city agency representatives, dealt with community development and housing activities on a city wide scale, while the Technical Advisory Committee (TAC), comprised of representatives of interest groups or private agencies, was responsible for housing and community development activities.

During the second year of the CDBG program, the Department of Development reduced the number of citizen forums from seven to two and used more small scale community/neighborhood meetings. In its grantee performance report, the Department outlined its rationale for reducing the number of large public hearings:

The experience of the Department of Development during the first two program years planning indicated that the large public hearings were unwieldy. The hearings provided open forums for communication of the Act's intent and process, and also provided a city-wide activity for citizen participation. While the quantity of information exchange was substantial, the quality was

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As a result, the Development Department used over 130 small scale neighborhood meetings in order to obtain citizen input and disseminate information. After comparing these smaller scale meetings to the larger citizen forums, the Department of Development concluded that "smaller scale meetings have provided better understanding of the program by a greater number of people." 

Citizen participation during the third year of the CDBG program in Columbus was characterized by the same overall approach that was implemented during the second year. Two citizen forums were held, a series of no less than four program area meetings were conducted in each program area "to develop CD project activities for each program area to include update and refinement of needs and conditions, development of CD concept and strategies, and complete the detailed planning of the projects. These meetings were designed to provide the opportunity for all the residents of each program area to participate in CD activities." 

The central difference between the second and third year is that the number of community meetings was reduced from 130 to 50. The rationale used for this reduction was "to concentrate the efforts in order to better evaluate first and second year experiences as input to third year recommendations."

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164 *Third Year Community Development Plan* 1977, p. 46.
Also, the Technical Advisory Committee was replaced by a Housing Advisory Council (HAC) which was designed to "develop a more formal recognized role as a subcommittee of the Development Commission, and broaden the scope of its activities to include community development and housing concerns that are not directly related to Community Development Block Grant matters." Two public hearings were held before City Council providing the citizenry with the opportunity to review the Development Department's recommendations to City Council for the use of CDBG funds and an opportunity to recommend any changes or amendments to the third year CD proposals. During the third program year, as in the first two years, the Columbus citizenry had an opportunity to participate in the development of the CDBG application if they were aware of the city meetings. The minimum standards for citizen participation established by the 1974 Housing and Community Development Act were met in Columbus.

With the passage of the Housing and Community Development Act of 1977, there were considerable revisions and extensions of the citizen participation requirement. For localities interested in receiving CDBG funds, the new cit-

168 N. Jack Huddle, Third Year Community Development Plan (Columbus: Department of Development, 1977), p. 46.
izen participation requirements led to substantial modifications in the citizen participation process established during the preceding three years. The 1977 act stated that "to receive a grant the city or county must submit an application which:"

provides satisfactory assurances that prior to submission of its application, it has a) prepared and followed a written citizen participation plan which provides citizens an opportunity to participate in the development of the application, encourages the submission of views and proposals, particularly by residents of blighted neighborhoods and citizens of low-and moderate-income, provides for timely responses to the proposals submitted, and schedules hearings at times and locations which permit broad participation; b) provided citizens with adequate information concerning the amount of funds available for proposed community development activities and housing activities, the range of activities that may be undertaken, and other important requirements; c) held public hearings to obtain the views of citizens on community development and housing needs; and d) provided citizens with an opportunity to submit comments concerning the community development performance of the applicant...

The key changes brought about by the 1977 act include the requirement for a written citizen participation plan and the emphasis on involving low and moderate income residents in the grant application process.

As a direct result of the 1977 act, Columbus extended its citizen participation requirements during the planning process for the fourth year of the CDBG program. Five

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city-wide public forums were held to obtain citizen input into the grant application process. Six public hearings were also held "in order to provide a forum for a public review of departmental recommendations to City Council for the use of CDBG funds and an opportunity to recommend any changes for amendments to the fourth year CD proposals."\(^{170}\) A series of no less than four neighborhood meetings were held in areas selected to receive CDBG funds. These forums for citizen participation had been used in varying degrees during the first three years of the CDBG planning process. But the number of city-wide forums was increased over the second and third program years and an important vehicle for citizen participation, the Community Development Task Force, was created and assumed a formal participatory role as a result of the 1977 legislation. A subcommittee of the Housing Advisory Committee, the CD Task Force is comprised of members of that committee and representatives of the neighborhoods chosen to receive CDBG funds. During the fourth year planning process, the Task Force held eleven meetings beginning January 1978 and ending June 1979. These CD Task Force meetings were held to:

a) provide citizens with information concerning the amount of funds available; b) obtain citizen views of community development and housing needs at the initial stage of application development; to provide an opportunity to articulate those

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needs and express preferences; to assist in the selection of priorities and establishment of CD and housing goals; and to gain involvement in the development of the CD Plan for the next 3 years of CD activity, to include target area recommendations; c) provide citizens with an opportunity to assist in the development of detailed planning activities in proposed neighborhood redevelopment areas and allocation of funds to specific projects; d) to provide citizens with an opportunity to make public review and comment regarding the proposed application as presented to Council; e) inform citizens as to the status of the processing and review of the CD application; f) provide citizens with an opportunity to become involved with the implementation of the CD program; g) provide citizens with an opportunity to: 1) monitor and submit comment on all aspects of the CD program, and 2) evaluate projects and activities to determine if objectives are being achieved.¹⁷¹

The Community Development Task Force has been an important vehicle for citizen participation, because it affords the Columbus citizenry the opportunity to attend community meetings during the target area selection process. According to senior bureaucrats who have been involved in the implementation of the CDBG program since its inception in Columbus, citizen participation during the early years of the program was characterized by the Department of Development presenting the community with a detailed plan regarding where CDBG funds should be distributed. But with the passage of the Housing and Community Development Act in 1977, and the establishment of the Community Development Task Force, the citizenry now had a formal vehicle for participation through representatives from various neighbor-

¹⁷¹ FY 1978 Application: CDBG Program.
hoods in the Columbus area. The Task Force also insured that low and moderate income residents would be represented in the grant application process. Since its creation in 1978, the Task Force has worked with the Department of Development in submitting a final CDBG application for city council consideration. The city of Columbus has provided for citizen participation in the CDBG program through public hearings, CD Task Force meetings, and neighborhood meetings between city planners and area residents in areas targeted for CDBG funding.

CITIZEN PARTICIPATION IN COLUMBUS: MEETING FEDERAL GOALS?

This section will evaluate whether Columbus has met citizen participation requirements as mandated in the Housing and Community Development Acts of 1974 and 1977, and compare Columbus' citizen participation mechanisms to those used by other localities receiving CDBG funds. The definition of citizen participation used here is the same one that is used by Paul Dommel and Richard Nathan in their empirical study of the CDBG program for the Brookings Institution. Citizen participation is defined "broadly to include the entire process by which organized groups and individual citizens are informed about the program and/or participate in preparing the grant application." Over

the eight years of the implementation of the CDBG program, citizen participation has been achieved through the participation of advisory committees, neighborhood-based groups, and interest groups in the formation of the CDBG application and community development plan.

During the first three years of the implementation of the CDBG program in Columbus, the Development Department scheduled citywide hearings to afford the citizenry the opportunity to participate in the grant application process. At the same time, city planners worked with residents before program areas were selected and after specific program areas were chosen to receive CDBG funds. The city-wide forums and neighborhood meetings actually exceeded the limited citizen participation requirements mandated in the 1974 Housing and Community Development Act. Citizens were provided with basic information regarding the CDBG program and had an opportunity to "articulate needs" and "express preferences about proposed activities" by attending the meetings.

After the Housing and Community Development Act of 1977 was enacted, the Development Department had to extend citizen participation in order to comply with the new regulations. The Community Development Task Force was created in 1978 and was required to have members from low and moderate income neighborhoods such as South Linden, Milo Grogan, and

Harrison West. More public hearings were held and a formal citizen participation plan was written by the Development Department. Citizens were also given "the opportunity to submit comments concerning the community development performance of the applicant." With these changes, Columbus did satisfy the extended citizen participation requirements, although some individuals still believe that the concerns of low and moderate income residents are not considered enough in the grant application and target area selection process.

When compared to other areas receiving CDBG funds and implementing citizen participation, Columbus compares favorably. In the 1977 Brookings study of sixty-one communities, "thirteen held only public city-wide hearings; seventeen had general and neighborhood hearings; eighteen appointed a citizen advisory committee; and thirteen held hearings to supplement the advisory committee's work." Since the 1977 Housing and Community Development Act, Columbus has used all of these citizen participation vehicles.

A number of empirical studies have been conducted to ascertain whether the citizen participation requirements formulated at the national level have been met in localities. While Brookings' studies and HUD's internal reviews

have found that statutory requirements for citizen participation are being satisfied, the Advisory Commission on Intergovernmental Relations' survey of CDBG cities and counties, found "that a noticeable percentage of cities and counties were not holding the required public hearings."\(^7\)\(^4\) In its study of citizen participation in the American political system, the Commission concludes that because CDBG programs were being spread out from low income areas "to encompass a wider but more scattered range of benefits,"\(^1\)\(^7\)\(^5\) this is further evidence that the participation of low income groups is not being encouraged in many urban areas. Since the inception of the CDBG program in 1975, the statutory requirements for citizen participation have clearly been met. Yet Columbus, like other localities, needs to do more with respect to obtaining more citizen input from low and moderate income residents. This point will be developed more fully in light of the 1983 citizen participation process described in chapter five. And finally, citizen participation in Columbus since 1975 confirms HUD's 1976 findings that citizens' impact is highest "at the planning stages when needs are analyzed and priorities set, lower in the selection of activities for funding


\(^{17}\) Citizen Participation in the American Federal System p. 149.
and the designation of neighborhoods where projects will be located, and lowest in evaluating program performance.  

Chapter four will be devoted to an exhaustive examination of the implementation of citizen participation in the CDBG program in Columbus during 1983 and will provide explanations for why there is little citizen involvement after the planning stage of the grant application process.

\[176 \text{Van Horn, p. 112.}\]
Chapter IV
THE IMPLEMENTATION OF THE COLUMBUS CDBG PROGRAM

With the setting of the national and local implementation context in chapters two and three, it is now possible to offer a detailed analysis of the implementation of the Columbus CDBG program during 1983. Implementation is "the process of carrying out authoritative public policy directives"177 and "encompasses those actions by public and private individuals (or groups) that are directed at the achievement of objectives set forth in prior policy decisions."178 As Van Meter and Van Horn suggest, while policy implementation and policy impact are related concepts, they are different to the extent that "impact studies typically ask 'What happened?' whereas implementation studies ask 'Why did it happen this way?'"179 This chapter will focus primarily on the implementation of the Columbus CDBG program and identify factors that affect the dependent vari-


179 Van Meter and Van Horn, p. 448.
able of this dissertation—program performance. The 1983 implementation process is compared to the implementation of the CDBG program in previous years. Data are provided based on interviews with members of city council, Department of Development bureaucrats, Community Development Task Force members, and citizens; observing community meetings; and examining federal and local documents.

A central goal of this chapter is to place the empirical findings of this research within the context of the implementation literature. The first section lays the groundwork for extending and reinforcing previous implementation conclusions by describing both the empirical and conceptual implementation literature. Section two explicates the conceptual implementation framework developed by Van Meter and Van Horn which guides this dissertation research. The remainder of this chapter examines factors affecting the grant formulation, application, and distribution process during 1983, and identifies the implications of these findings for existing models of policy implementation. It is argued that policy standards, such as "maximum feasible priority" have been so loosely enforced by HUD that they have allowed Columbus Development Department bureaucrats to implement the CDBG program in accordance with local needs rather than emphasizing the legislative goal of aiding low and moderate income citizens. The key implementation con-
The policy implementation literature is characterized by two approaches: the hierarchical approach; and the bureaucratic discretionary. The hierarchical model is the classical model of policy implementation which dominated the field before the 1970's. Its fundamental claim is that
implementing public policy is "a technical, nonpolitical activity that proceeded in response to directives from the top." This model assumes that members of Congress articulate clear legislative goals at the national level, and that bureaucratic officials in states and localities implement the policies in accordance with these clearly defined objectives. The political neutrality of the implementors is stressed, and it is assumed that instructions from Congress are implemented "in an automatic fashion." As Nakamura and Pinderhughes suggest, the advantage of this model is its clarity of description. Because "it is concerned with the ways in which the goals of legitimate officials are translated into action by bureaucrats and others in the permanent structure of government," the model offers a clear description of how to identify the success or failure of policy implementation. Second, the classical hierarchical model also prescribes "the order in which implementation research should be organized, beginning with the policy making, proceeding to implementation, and concluding with an evaluation of how well or how poorly the

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180 Nakamura and Smallwood, p. 18.
181 Nakamura and Smallwood, p. 18.
original policy goals were satisfied." A third major advantage of the model is that it emphasizes the importance of identifying policy goals at the outset and thus it "provides researchers with objective criteria for conducting an evaluation of the success or failure of the implementation process." 

With the vague goals and ambiguous wording that characterized the War on Poverty and Great Society legislation, the assumptions of the classical hierarchical model of implementation were challenged. It became clear to students of policy implementation that given the ambiguity of the language of "maximum feasible participation" and the conflicting goals formulated at the national level, bureaucratic discretion at the local level was a key element of the policy implementation process. This is the cornerstone of the bureaucratic discretionary model. Its fundamental assumption is that lower-level bureaucrats who implement policy have considerable discretion. Thus "the relationship between the objectives of high-level officials and the manifest actions of the agencies they direct are at best problematic." 

183 Nakamura and Pinderhughes, p. 6.
184 Nakamura and Pinderhughes, p. 6.
Society programs conducted during the 1970's challenged the basic assumption of the classical hierarchical model that clear legislative goals guided the actions of neutral bureaucrats at the local level. In her comparative case study of the New-Towns In-Town program, Martha Derthick found that a major reason for its failure "resulted from the limited ability of the federal government to influence the actions of local governments and from its tendency to conceive goals in ideal terms."86 After studying the implementation of the Economic Development program in Oakland, Pressman and Wildavsky conclude that "in most policies of interest, objectives are characteristically multiple, conflicting, and vague."87 They suggest that while there was widespread agreement at the local level that the goal of the program was to provide jobs for minority unemployed, "differing perspectives and senses of urgency made it difficult to translate broad substantive agreement into effective policy implementation."88 The many actors involved in the implementation process at the local level can impede timely policy implementation depending upon the intensity of their preferences and the number of partici-


88 Pressman and Wildavsky, p. 113.
pants at each decision point.

While such scholars as Derthick and Pressman and Wildavsky provided empirical evidence to support a revised model of the policy implementation process, others offered various conceptual schemes that stressed bureaucratic discretionary decision making in the absence of clearly defined legislative goals. Eugene Bardach uses the metaphor of an "implementation game" to depict "the numerous political and bureaucratic games" that occur in the local process.¹⁸⁹ He concludes that the central implementation problem is "the characteristic presence of fragmented and isolated maneuvers and countermaneuvers"¹⁹⁰ by local bureaucrats which contributes to an overall lack of bureaucratic control and accountability. Michael Lipsky stands the classical hierarchical model on its head and contends that the proper focus of implementation study is "on those who are charged with carrying out policy rather than those who formulate and convey it."¹⁹¹ In a later study Lipsky stressed the importance of examining the relationships of various street level bureaucrats to service delivery.¹⁹² His thesis is


¹⁹⁰ Bardach, p. 42.

¹⁹¹ Lipsky, pp. 397-398.

that because "the objectives of high-level officials and the manifest actions of the agencies they direct are at best problematic," the preferences of service deliverers must be considered in a conceptual implementation framework. Like Lipsky, Walter Williams stresses the importance of viewing implementation "from the bottom" by concentrating "attention on service deliverer and client and the organizational structure and process within which their interaction takes place." This "implementation perspective" also characterizes the conceptual work of Richard Elmore. Elmore advocates using the backward mapping model of implementation analysis because "backward mapping explicitly questions the assumption that policymakers ought to, or do, exercise the determinant influence over what happens in the implementation process. It also questions the assumption that explicit policy directives, clear statements of administrative responsibilities, and well-defined outcomes will necessarily increase the likelihood that policies will be successfully implemented." Ran-

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195 See Walter Williams, The Implementation Perspective (Berkeley: University of California Press, 1980)

Randall B. Ripley and Grace A. Franklin extend previous conceptual implementation literature by detailing the pervasive influence of the bureaucracy in the policy implementation process. According to Ripley and Franklin, bureaucratic autonomy characterizes implementation:

Individual bureaucrats deliver the products and services of their agencies—both benefits and restrictions—to both individual and corporate clients. They interpret legislation both informally and formally through writing rules and regulations. They apply programs to individual cases and adjudicate appeals of those decisions. They make the detailed decisions about resource allocation.

Individual bureaucrats have lots of latitude in their activities in part because statutes are almost inevitably ambiguous or at least leave many gaps.  

Here Ripley and Franklin identify the central element of bureaucratic autonomy in the absence of clear legislative objectives. Their observation reinforces the Van Meter and Van Horn policy framework to which we now turn in more detail.

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THE IMPLEMENTATION OF THE COLUMBUS CDBG PROGRAM

As the Van Meter and Van Horn policy implementation framework suggests, policy analysts must consider elements of both macro- and micro-implementation when evaluating the implementation of public policy. The dynamic, disparate nature of the policy implementation process cannot be ignored, and Paul Berman is correct to suggest that a key weakness of implementation analysis has been its lack of a "conceptual framework that places individual studies within their larger sectoral context and facilitates cross-sectoral comparisons."198 Yet the conceptual work of Van Meter and Van Horn offers a major contribution to policy analysts who wish to analyze specific factors affecting program performance systematically. The framework offered by Van Meter and Van Horn builds upon previous research and attempts to impose order on "the disparate character of the public policy literature" and the policy implementation process.199 Policies are classified according to the amount of organizational change that is required at the local level, "the extent to which the policy deviates from previous policies, and the extent to which there is goal consensus among the participants in the implementation pro-


cess." They contend that six independent variables affect policy implementation: policy standards and objectives; policy resources; intergovernmental communication and enforcement activities; the characteristics of the implementing agencies; economic, social, and political conditions; and the dispositions of implementors. Van Horn's extension and application of this framework to his study of the implementation of General Revenue Sharing, the Community Development Block Grant Program, and the Comprehensive Employment Training Act underscores the utility of applying a coherent framework of analysis to specific case study examinations. The remainder of this chapter is devoted to applying the revised Van Horn conceptual implementation framework to the implementation of the Columbus CDBG program in an effort to explain program performance. Specific questions generated by the conceptual framework are raised and findings regarding factors affecting policy implementation draw upon the previous discussion of the implementation literature and models of the policy implementation process. Let us develop the six independent variables in light of the Columbus 1983 CDBG implementation process.

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200 Van Peter and Van Horn, pp. 458-459.
Adequacy of Funding and Other Incentives

The adequacy of program funding and other federal incentives, including more or less federal oversight, adding or eliminating staff, and increasing or decreasing program funding, clearly affect the local policy implementation environment. The adequacy of funding and other incentives in the Columbus implementation context was ascertained by studying various HUD documents, examining characteristics of the block grant, and interviewing Department of Development bureaucrats and HUD officials in the Columbus HUD office.

As table one indicates, the amount of CDBG funds distributed to Columbus since President Reagan entered office in 1981 has not declined considerably. The 1983 grant allocation actually reveals a $500,000 increase when compared to the 1982 monetary figure. Interestingly, the perception of local Development bureaucrats, city council members, and interest group members is that during 1983 the Columbus CDBG program has been operating under severe resource constraints. This perceived resource scarcity has contributed to implementation problems and conflict over the distribution of program benefits. A number of Development Department bureaucrats identified the problems of resource scarcity:
The block grant can't deal with all of the programs needing to be funded in a time of decreasing resources. Other social programs are being cut back and people want the CDBG program to pick up and fund those services previously funded.

There is a limited amount of money and lots of people want a piece of the pie.

There are no real implementation problems except there is not enough money. The program could be improved in terms of resources.

The biggest problem is that the money is a pitance to the community's needs.

When asked to assess the impact of the Reagan reforms on CDBG program implementation, two city council members pointed to the lack of program resources:

Under Reagan there seems to be a spirit of apprehension in terms of funding and administration. Often times, we are robbing Peter to pay Paul.

Reagan has cut back other federal programs, such as CETA, and this has affected the CDBG program.

As these comments suggest, CDBG program resources affected the local policy implementation environment in three different ways. Since President Reagan has slashed the federal funding of many social programs, including CETA, the CDBG program is now one of the few federally funded programs available to meet the needs of local communities and neighborhoods. Second, citizens who once received funding under CETA now look to the CDBG program for various ben-
efits. It is not surprising that despite HUD's maintenance of Columbus CDBG program resources from 1982 to 1983, there is increased conflict between community groups over limited program resources to fund a wider array of needs. A third explanation for the connection between program resources and the local implementation environment is the longevity of the Columbus CDBG program and rising expectations on the part of the citizenry. The 1983 implementation process included the formulation of a new three year plan and selection of additional target areas. The significance of this funding process for various community groups cannot be underestimated, as numerous citizen activists argued that their areas should be chosen as target areas and receive program benefits. The nature of the 1983 implementation process and the lack of program resources have contributed to increased implementation conflict in Columbus. Conflict between citizens and bureaucrats and city council members is examined further in this chapter and more intensively in chapters five and six.

As Van Horn suggests, federal incentives can work to insure goal compliance in the implementation process at the local level. By its very nature, the block grant "permits flexible and shifting responses by the federal bureaucracy."201 The block grant also encourages flexibility on the part of local bureaucrats and the local implementing agen-

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201 Van Horn, p. 114.
Hence, incentives in the form of technical assistance and increased staff support can "influence the behavior of implementors" and work to regulate the behavior of local bureaucrats in a highly "fragmented federal system." 

The Columbus CDBG implementation process is characterized by limited federal HUD oversight. All five of the Columbus HUD officials interviewed indicated that Columbus has complied with federal regulations and objectives through the years. As a result, it has not been necessary to use federal incentives in order to insure program compliance. One explanation is that HUD's threat of using a variety of incentives has encouraged Development Department officials to comply with CDBG regulations and objectives. Interviews with DOD bureaucrats revealed that the local HUD office played a limited role in affecting the overall implementation of the CDBG program and distribution of benefits.

Yet Van Horn and Van Meter offer a word of caution when considering these conclusions. They contend that "federal officials may be so concerned with maintaining cooperative relationships that they soften demands for compliance, lose sight of the goals of the policy, and even assume advocacy

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203 Van Horn and Van Meter, p. 53.
roles for the local agencies." From the vantage point of certain Development Department officials, city council members, and citizen activists, the Columbus CDBG program has been and is plagued with serious implementation problems. It is interesting to note that when asked the question "are there problems in implementing the Columbus CDBG program?" all five of the HUD officials responded "no." While it is not possible to prove empirically that the Van Horn and Van Meter interpretation can be applied to Columbus, it is also not systematically disproved. Placed within the context of implementation problems cited by other actors in the process, the Van Horn and Van Meter explanation is more satisfying than the simplistic conclusion offered by HUD officials that federal incentives have not been warranted in Columbus.

**Standards, Objectives, and Procedures**

As the policy implementation literature suggests, the degree of goal clarity, contradictions in policy standards and objectives, and specificity in procedures will affect the dispositions of local implementors, and the communications and enforcement of policy that characterizes the national policy environment. The espoused federal goals of the Housing and Community Development Acts of 1974 and 1977 are many, vague, and conflicting. These goals include aid-______________

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204 Van Horn and Van Meter, p. 53.
ing low and moderate income people, eliminating slums and blight, responding to urgent local needs, developing viable urban communities, providing "decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income," conserving and expanding the nation's housing stock, achieving citizen participation, and pursuing community development.

As the congressional and policy implementation literature suggests, the national policy environment clearly affects the formulation of policy objectives. In the case of the CDBG program, vigorous interest group activity characterized the formulation of the original act. The National League of Cities, U.S. Conference of Mayors, the International City Managers Association, and the National Association of Housing and Redevelopment officials were all actively involved in the formulation process. While at times these groups pursued different goals, they were united in opposition to the Nixon administration's efforts that would turn a number of federal programs over to localities with few strings attached. The National Urban Coalition, representing the interests of civil rights, labor, and religious groups,205 was particularly concerned that a "no strings approach" would lead to a lack of funds being distributed to low income groups. Hence, there was considerable interest group support for the Senate Community Devel-

opment Assistance Act of 1973 which provided that 80 per-
cent of the funds must be used for activities that benefit
"low- and moderate-income residents."206

As chapter two indicates, there were three different
legislative proposals offered at the national level: the
Nixon administration's Better Communities Act, the House of
Representatives Housing and Community Development Act of
1973, and the Senate Community Development Assistance Act
of 1973. After much debate and compromise between the key
actors involved, elements of these three proposals were
combined to create the Housing and Community Development
Act of 1974. The history of this legislation suggests
that given the vigorous interest group activity and lack of
policy consensus at the national level, multiple, vague,
and conflicting policy objectives were needed to satisfy
the individuals and groups involved in the policy forma-
tion process.

When asked to identify the goals of the CDBG program,
one Columbus bureaucrat stressed the uncertainty that is
representative of many of the responses:

I don't know if we know. There are many con-
flicting goals. It has hurt implementation in
the long run because much money is wasted.

Another bureaucrat was even more critical of the lack of a
clear goal statement to guide implementation and program
evaluation:

206 Dommel, p. 27.
There is no goal statement. We must have a goal statement. How do you evaluate the program without one? How do you know if you are being successful? It is absolutely outrageous that there are no goals.

The policy standards that accompanied the goals of the Housing and Community Development Act of 1974 were also vaguely written and led to confusion in the implementation of the CDBG program in Columbus. In their grant applications, prospective grant recipients were required to assure HUD that "maximum feasible priority" was given to the concerns of low- or moderate-income families. Localities also had to hold public hearings that provided adequate opportunity for citizen participation. A Housing Assistance Plan207 had to be submitted along with the grant application.208

For policy implementors at the local level, the central problem has been how to give "maximum feasible priority" to low and moderate income citizens. Since HUD refused to endorse this clause actively in the early years of program implementation, this led many localities to ignore the original intent of the legislation. Interviews with long time Columbus Department of Development bureaucrats indi-

207 As chapter three indicates, the Housing Assistance Plan was designed "to analyze the conditions of the community's housing stock and evaluate the needs of its low-income residents or those expected to reside there as a result of current or future employment opportunities," Van Horn, p. 106.

208 Van Horn, p. 106.
cate that only after specific program areas were selected, did the Department of Development encourage low and moderate income residents of these areas to participate in the planning process.

**Degree of Change Required by the Policy Standards and Objectives**

With the passage of the Housing and Community Development Act of 1977, Congress attempted to strengthen procedurally the requirement "that the entire block grant should benefit persons principally of low and moderate income." Changes were made in the targeting requirements, the grant allocation formula and citizen participation requirements. In response to these statutory changes that were accompanied by revised policy standards, Columbus created the Community Development Task Force, which was designed to increase low and moderate income citizen participation in the grant application process. With the establishment of the Community Development Task Force in 1978, the Columbus citizenry now had a formal vehicle for participation as various neighborhoods were represented. And as a result of changes in policy standards, low and moderate income citi-

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209 Rosenfeld, p. 220.

210 See pp. 46-47 of chapter two for a specific discussion of these requirements.

211 See chapter three for a lengthy discussion of the Community Development Task Force.
zens have participated in the grant application process. Yet as will be discussed more fully in chapter five, the policy standards do not clearly specify the link between citizen participation and the distribution of program benefits. The lack of clarity in the policy standards has afforded Department of Development bureaucrats great discretion in implementing citizen participation and has led some Columbus citizens to argue that the concerns of low and moderate income residents are not taken into consideration when distributing program benefits.

In his study of the CDBG program, Van Horn concludes that "the statute itself was not a highly influential factor in determining governance patterns."212 As Van Horn suggests, the legislation and policy standards "left federal and local implementors with substantial freedom to define their roles and responsibilities."213 The Columbus implementation experience confirms Van Horn's conclusions. Policy standards, such as "maximum feasible priority" have been so loosely enforced by HUD that they have allowed Columbus Development Department bureaucrats to implement the CDBG program in accordance with local needs rather than emphasizing the legislative goal of aiding low and moderate income citizens. The extent to which vague policy standards and objectives has affected citizen participation in

212 Van Horn, p. 114.

213 Van Horn, p. 114.
Columbus is assessed in chapter five.

Communication

The communication of the policy refers to "the accuracy, clarity, and timeliness of communications by federal officials." Our system of federalism makes clear communication between levels of government challenging as policy directives are often distorted.

Personal interviews with local HUD officials revealed a lack of consistency and agreement regarding the goals of the CDBG program. When asked "what are the goals of the CDBG program," one leading local bureaucrat responded:

- achieving economic development through job production and assisting neighborhood organizations, urban revitalization, fair housing, and assisting low and moderate income.

Other HUD bureaucrats identified the following goals:

- aiding low and moderate income residents, arresting slums and blight, and meeting urgent needs.
- to have a safe and suitable living environment.
- meeting the needs of low and moderate income and neighborhood revitalization.

These comments indicate the lack of HUD consensus regarding program goals and objectives. The goal uncertainty that has plagued the implementation of the CDBG program from the outset has contributed to unclear communication between local HUD officials and Development Department bureaucrats. This lack of communication is reflected in the widespread
disagreement among local implementors regarding CDBG goals. As table two indicates, the inability of HUD bureaucrats to agree on specific program goals has led to unclear communication between HUD and Department of Development bureaucrats and city council members. This contributes to uncertainty in program implementation and enforcement, while fostering greater street level bureaucratic discretion. Ultimately, the failure of clear communication regarding program objectives and standards will affect who governs, how the funds are used, and who benefits from overall program performance. The link between unclear communications the local policy environment, and program performance is developed more fully later in this chapter.
Table 2

Implementor Perceptions of CDBG Program Goals

<table>
<thead>
<tr>
<th>Goals Identified</th>
<th>DOD</th>
<th>CDTF</th>
<th>CC</th>
<th>HUD</th>
<th>GROUPS</th>
<th>TOTAL</th>
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<td>1</td>
<td>8</td>
<td>19</td>
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<td>9</td>
<td>2</td>
<td>4</td>
<td>9</td>
<td>30</td>
</tr>
<tr>
<td>Alleviate Slums and Blight</td>
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<td>3</td>
<td>2</td>
<td>2</td>
<td>3</td>
<td>16</td>
</tr>
<tr>
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<td>0</td>
<td>2</td>
<td>0</td>
<td>7</td>
</tr>
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<td>2</td>
<td>2</td>
<td>6</td>
<td>13</td>
</tr>
<tr>
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<td>4</td>
<td>1</td>
<td>1</td>
<td>6</td>
<td>12</td>
</tr>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td>3</td>
</tr>
</tbody>
</table>

DOD=Columbus Department of Development Bureaucrats  
CDTF=Community Development Task Force Members  
CC=City Council Members  
HUD=Columbus Housing and Urban Development Bureaucrats  
GROUPS=Community and Interest Group Members  

*Figures represent the number of times respondents have identified a program goal in response to the following question: "What are the specific goals of the CDBG program?" Multiple responses were recorded and response categories were not specified ahead of time.

** Enforcement **

After policy standards have been communicated, they must be enforced by the federal agency. Since the inception of the CDBG program in 1975, HUD has played a changing role in enforcement of policy standards and oversight of local implementation. A study of HUD's role in the enforcement of the community development law concluded:

An issue here is how can HUD satisfy its administrative responsibilities and at the same time meet the mandate for decentralized decision making.\(^{2,14}\)

\(^{2,14}\) Van Horn, p. 112.
Van Horn provides an excellent description of HUD's role in the first years of program implementation:

HUD denied funding to three out of 1,324 cities and counties in the first year and to eight in the second, because they had refused to revise their Housing Assistance Plans to meet more realistic goals for low-income housing. HUD further demonstrated its preference for a low profile by not publishing a handbook outlining appropriate community development strategies, by refusing requests to bolster citizen participation guidelines, and by leaving undefined the meaning of the law's "maximum feasible priority" clause relating to low-and moderate-income groups.

Interviews with long time HUD officials and Development Department officials confirm the general conclusion that HUD enforcement of policy objectives and standards in Columbus during the CDBG program's first two years was limited.

With the passage of the Community Development Block Grant program in 1977 and the appointment of Patricia Roberts Harris as Secretary of HUD, there was more vigorous enforcement of policy standards and more federal oversight of CDBG program implementation. HUD's concern with meeting the needs of low and moderate income residents was reflected in the more specific definition of the term "maximum feasible priority." According to revised HUD regulations, "maximum feasible priority" was given to low and moderate income groups provided they were the recipients of at least 75 percent of a community's grant. After the Carter

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215 Van Horn, p. 113.
reforms, the Columbus HUD office played a more active role in overseeing the implementation of the CDBG program. The grant application process was scrutinized carefully before the distribution of program benefits. As a result of the 1977 reforms, Columbus is now responsible for providing HUD with a "grantee performance report" which details who receives program benefits. HUD can then ascertain whether low and moderate income individuals are grant beneficiaries.

President Reagan's election in 1980 and the subsequent appointment of Samuel Pierce as secretary of HUD signalled a return to the hands off policy that characterized HUD enforcement during the first three years of the CDBG program. While grantee performance reports have been continued, evaluation of CDBG program implementation has been reduced considerably. According to a Columbus HUD official who evaluated the Columbus implementation efforts under both President's Carter and Reagan, the Reagan reforms have seriously undermined the effectiveness of the CDBG program:

I liked the block grant until Reagan. The Reagan reforms have opened up the program to uncontrolled abuse by local governments. The eligibility requirements are so wide open now that you can use the funds for anything. This office no longer exercises control over the program ... The monitoring of the program now takes place after the fact. It is a big city mayor pork barrel program now under Reagan.

\[216\] Van Horn, p. 113.
Another Development Department official contends that a key weakness of the Columbus implementation process "is that there is very little program monitoring," and a long time community activist agreed:

Under Reagan the monitoring and evaluation of the CD program is very bad. Who has benefitted? Where has the money gone?

Yet another local HUD official argued that the Reagan cutbacks in federal enforcement and oversight has resulted in better program implementation:

There has been a marked improvement in the CDBG program under the New Federalism because it gives the cities more flexibility. The communities know what their true needs are. The program has multiple objectives and communities have been allowed to do their own thing.

A Development Department planner considered the Reagan reforms beneficial from the city's point of view:

HUD's guidelines are much more flexible under Reagan. The flexibility is better from the city's point of view... there is more flexibility in terms of using the money.

Interviews with HUD officials, Development Department bureaucrats, city council members, and community activists revealed that the Reagan administration's cutback in enforcement through federal oversight and monitoring has resulted in more discretion for local program implementors. The issue of whether increased discretion has resulted in better program performance is addressed later in this chapter when three key questions are examined: who governs?, how are the funds used?, who benefits?
Policy Change

National political actors and interest groups have initiated three major policy changes that have altered policy standards and resources and affected the Columbus implementation environment: the consolidation of elements of the Model Cities program under the creation of the CDBG program in 1974, the Carter administration reforms in 1977, and the 1981 Reagan reforms.

The formulation of the CDBG program in 1974 consolidated several categorical grants that comprised a portion of Johnson's Great Society, including urban renewal, model cities, open space and historical preservation, and basic water and sewer facilities. The move from broad categorical programs to the block grant signalled a number of changes in the local implementation environment. According to Deil Wright, "recipients of block grant monies have much more discretion in deciding what specific projects or purposes will be funded within a broad program or functional area." Wright also contends that block grants will reduce considerably "the planning, reporting, auditing and other 'red tape' aspects" of a federal program. Unlike categorical grant funds, block grant funds are distributed on the basis of a formula and fairly precise eligibility

provisions characterize the block grant approach.218

The national policy shift from the categorical grant to the block grant in the early 1970's led to a number of implementation changes and problems in Columbus. One senior Columbus Development Department official argues that this block grant flexibility fosters administrative problems:

The more flexibility, the more problems we have. Flexibility causes all kinds of administrative headaches.

When asked to compare the block grant programs of the 1970's with the categorical programs of the Johnson era, most senior Development Department bureaucrats spoke favorably of the block grant approach:

There is a lot to be said for both. But the CDBG program is better today. I like the block grant because it gives us more latitude to meet program objectives.

The CDBG program has been more effective than other programs such as Model Cities and Urban Renewal. History may bear out that the CD legislation may be one of the most significant pieces of legislation ever passed. The federal government said to the cities that we will help you out provided that you get your act together. The programs of the sixties were experimental in nature. We learned lessons from the sixties and as a result, the CDBG program is more productive now.

Although long time Columbus Development Department bureaucrats generally agreed that the shift to the block grant approach resulted in improved program implementation,

218 Wright, pp. 96-97.
they pointed to severe early implementation problems that have resulted in slow distribution of CDBG program benefits. The relationship between the national policy change from categorical to block grants and the resulting consequences for the agency staff is discussed when the local policy environment is considered.

The 1977 Carter administration reforms led to a number of changes in the Columbus policy environment and ultimately in overall program performance. As discussed in detail earlier, Columbus was required to change from broad program areas to the more narrow targeting of funds in an effort to aid low and moderate income individuals directly. Citizen participation was expanded with the creation of the Community Development Task Force and HUD monitoring, evaluation, and enforcement of program standards was increased.

With the Reagan administration reforms of 1981, there was a return to the hands off policy that characterized the Ford era. This has led to increased bureaucratic discretion at the local level as citizen participation requirements have been reduced considerably, and HUD monitoring, oversight, and enforcement activities have been cut back in an environment of resource scarcity. When asked to assess the changes in the implementation of the Columbus CDBG program under Reagan, one Development Department bureaucrat offered a typical response:
There are less program requirements under Reagan. CDBG money has become a good slush fund as we have broadened the types of things we will spend the money on, such as commercial revitalization and the creation of jobs through economic development.

A second Development Department official argued that under Reagan, "there is more politics at the local level as program resources are cut back." Another bureaucrat cited the lack of overall program structure under Reagan:

Overall, the program is less structured under Reagan. A lot of federal requirements have been dropped in terms of citizen participation and eligibility. The program has become a lot more discretionary. Citizens now have less input throughout the process.

The effect of the national level Reagan reforms on the Columbus citizen participation process and overall program performance is discussed more fully later in this chapter and in chapter five.

Attitudes and Dispositions of Local Political Officials and Administrators

Interviews with city council members and their staff, the mayor, and Development Department officials provided information regarding the attitudes and dispositions of local political officials and administrators toward the policy's standards and objectives, including their understanding and extent of agreement or disagreement with them."219 As the policy implementation literature sug-

219 Van Horn, p. 15.
gests, the attitudes of political officials and administrators in the local policy environment are affected by the policy standards and resources and the national policy environment. This general finding is confirmed by the study of the Columbus CDBG implementation process. As has been detailed above, policy resources, clarity and contradictions in policy standards and objectives, communication by federal officials, policy environment, and the degree of policy change all influence the local policy environment and the dispositions of local implementors. The attitudes of local political officials and administrators then affect CDBG program performance.

The Columbus CDBG implementation process is characterized by key actors holding conflicting views regarding the policy's standards and objectives. One city council member argued that this conflict leads to implementation problems and ultimately to major disagreements over how CDBG funds should be used and who should benefit:

There are differing perceptions on the part of the community, city council, and DOD. Can you provide home ownership possibilities to the low income? This is just one of the many areas of disagreement.

Table two provides empirical evidence to support the conclusion that the Columbus implementation environment is characterized by key actors having major disagreements regarding the goals of the CDBG program. Within the Colum-
bus Development Department, there is confusion and conflict among street level bureaucrats over program goals. In the absence of active HUD enforcement of specific policy objectives, Development Department bureaucrats are afforded more discretion over who should govern, how CDBG funds should be used, and who should benefit. When asked to identify who has the greatest impact with respect to the distribution of CDBG grants in Columbus, one senior Development Department official responded:

I think DOD does, because we have the information and staff. Sometimes I like to say I do. Sometimes I do.

The consequences of this bureaucratic discretion for program performance is discussed more fully later in this chapter and its implications for democratic theory are addressed in chapter six.

**Attitudes of Interest Groups and Citizens**

The differing attitudes of community and interest group members and citizens regarding program objectives and standards can lead to implementation conflict at the local level and may ultimately affect program performance. The Columbus CDBG implementation process has been characterized by a lack of community consensus regarding CDBG goals, who should govern, how the funds should be used, and who should benefit. As table two indicates, members of community and interest groups and CD Task Force members have differing
perceptions of program goals when compared to the views of Development Department officials and city council members. In the absence of a clear consensus regarding CDBG objectives, conflict has been the norm in the Columbus CDBG implementation process.

Several explanations can be offered for the lack of local consensus over CDBG program goals. The profusion of actors involved in the implementation process means that bureaucrats, city council members, the mayor and his staff, interest group members, and community activists all attempt to affect program performance in the absence of clear policy objectives and standards. As discussed earlier, the CDBG legislation contains multiple, competing, and contradictory goals. This vague legislation fosters a climate ripe for conflict between various local actors over policy implementation. One long time citizen activist argued that the lack of consensus regarding CDBG program goals leads to poor implementation:

The Department of Development does not know what the goals of the program are. As a result, they don't rationally know how to use the grant money.

Another citizen activist argued bitterly that the lack of clear program objectives and standards allows local political officials to distribute program benefits in accordance with their own needs:

The goals of the program are created by people to fit their own needs. Each city is unique in their own way in their selection of goals. Those
goals are meeting politician's needs, not the needs of citizens. Columbus city officials blame the national government for goals. This is a copout.

The national policy environment has also affected the attitudes of interest group members and citizens regarding the Columbus CDBG program, as HUD has adopted a hands off policy in enforcing policy goals and standards. Citizens who were involved in the CDBG implementation process during the Carter years remember the emphasis placed on benefitting low and moderate income residents. As a result, despite the 1981 Reagan reforms, some citizens still argue that the Columbus CDBG program should be implemented in accordance with the needs of low and moderate income citizens. When asked to identify the goals of the CDBG program, several community activists stressed the importance of aiding low and moderate income residents:

To facilitate community development in an effort to create jobs and more opportunities for low income people. The goals of the program are only being reached somewhat, as some of the money goes to rich people.

Housing rehabilitation for low income citizens. But the potential distributional effects of the CDBG program have not been embraced by people running the program.

Members of the CD Task Force also argued that the Columbus CDBG program should continue to meet the goals emphasized prior to the Reagan reforms:

The program should help low and moderate income neighborhoods with rehabilitation. Under Carter, we were effective in reaching this goal.
are moving away from the needs of low and moderate income.

The goal is to provide decent, affordable housing for Columbus citizens. We are getting sidetracked in reaching this goal. There are too many conflicting goals in this program.

Yet as figure two suggests, there is hardly widespread consensus among community group members and citizens regarding which goals should guide the implementation of the Columbus CDBG program.

The Characteristics of the Local Implementing Agency

As Van Horn suggests, "the competence of the agency staff and the degree of support they receive from local political officials" affects program performance. The policy standards and resources and characteristics of the national policy environment, including communication, enforcement, and policy change affect the characteristics of the local implementing agency. Interviews with bureaucrats, city council members, HUD officials, community group members, and citizens provided support for applying these conclusions to the implementation of the Columbus CDBG program.

In the early years of the CDBG program, the lack of competence on the part of the Columbus Development Department staff adversely affected program implementation. With the national policy shift from the categorical programs of the Johnson era to the block grant programs of Nixon's New Fed-

220 Van Horn, p. 15.
eralism, local bureaucrats played a more integral role in the distribution of program benefits. As discussed in chapter three, members of the CD Task Force, City Council, Development Department officials, and newspaper accounts all contend that street level bureaucrats lacked the expertise to implement the CDBG program efficiently. Those bureaucrats responsible for writing and implementing loan and grant proposals lacked the expertise to do so in a timely and efficient manner. The lack of quality technical assistance available to the citizenry contributed to serious implementation problems according to a former member of the CD Task Force:

There was insufficient control over the rehab program. The staff did not supervise the quality of work. It was not a well administered program at the grass roots level. Fundamentally, there was a morale problem as little leadership was present. During the early years there were also atrocious communications problems between bureaucrats and citizens.

One citizen activist offered his view of implementation problems during the early years:

They were losing more money than they were spending through inflation. They were not getting the money out into the community fast enough. An enormous amount of money was being put into administrative costs with little return on the investment.

Unlike the early years of the Columbus CDBG program, the 1983 implementation process has been characterized by few criticisms of Development Department staff competence.
Several citizens and members of the CD Task Force did question the spending of one billion dollars out of nine million dollars on administrative costs. It is not surprising that in a time of increased resource scarcity, actors involved in the policy implementation environment are questioning administrative costs.

Besides the competence of the agency staff, the degree of support that staff members receive from local political officials will affect program performance. The Columbus Development Department has received strong support from the mayor and city council members. As chapter three suggests, Mayor Tom Moody has played an inactive role in the overall implementation of the CDBG program. Moody selects the head of the Development Department and has allowed the director and his staff to make crucial decisions regarding program administration and implementation. Mayor Moody described his role in a personal interview:

My role is in one sense very limited, but it is one of ultimate responsibility. I leave the mechanics of the program to DOD. The Director and his staff administer the program.

Because Moody has displayed such a limited interest in the implementation of the Columbus CDBG program, he offers Development Department staff support through his inactivity.

Unlike the mayor, the city council has played a much more active role in implementing the Columbus CDBG program.
The city council is ultimately responsible for approving the final CDBG grant application. According to most long time observers of the Columbus implementation process, the council rarely changes the funding recommendations offered by the Development Department. Only when the Task Force and Development Department have a major disagreement over funding priorities does the city council alter bureaucratic recommendations. The 1983 grant application process supports these conclusions as City Council accepted Development Department and Task Force original target area recommendations and added a smaller fifth area only after receiving the support of both the Development Department and the Task Force. Modifications of Development Department and Task Force recommendations were only present in the shifting of grant allocations between program categories. The 1983 grant application and CDBG implementation process has been characterized by elected official support of Development Department activities.

**Local Economic and Social Conditions**

To the Reagan administration, block grants are an effective way to aid states and localities because they "reduce the administrative capacity of the grant structure," emphasize the integral role of states and localities in the intergovernmental system, afford bureaucrats greater flexibility in spending federal dollars, and "provide the bridge
to total turnback of program responsibility and revenues that the administration desires." Within this broad context of Reagan administration reform, the local economic and social conditions of Columbus are considered.

Interviews with Columbus implementation actors reveal the local need for the CDBG program in a time of high unemployment amidst federal program cutbacks. Bureaucrats, and members of the city council, community groups, and the CE Task Force all agreed that the CD grant money is a pit-tance to meeting the needs of Columbus neighborhoods. With the massive federal cutbacks in programs such as CETA, CDBG grant dollars are needed to provide for a growing number of services. In a time of increased resource scarcity, there has been more conflict between neighborhoods and neighborhood groups over the important decisions of who should govern, how the funds should be used, and who should benefit. Conflict between citizens and Development Department bureaucrats over the selection of target areas and the distribution of program benefits characterized the 1983 Columbus CDBG grant application process. Long time observers contend that this conflict was more excessive than in previous years due to decreased overall resources in a time of increased need and the fact that important decisions

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were made by a new three year plan. The 1983 Columbus CDBG implementation process indicates that there will likely be even more local conflict in the future as street level bureaucrats are afforded more discretion to determine how funds are used in the absence of clearly defined legislative goals during a time of increased resource scarcity. The consequences of this bureaucratic discretion and reliance on the block grant approach for the citizenry is discussed more fully in chapter six.

THE_DEPENDENT_VARIABLE: PROGRAM PERFORMANCE

Who Governs?

The Columbus CDBG implementation experience supports Van Horn's conclusion that "patterns of CDBG governance are determined principally by the local policy environment, especially the attitudes of local officials and the nature of local politics." The national policy environment has had a limited impact on who governs the Columbus CDBG implementation process. Changes at the national policy level, especially the 1981 Reagan reforms, have resulted in less HUD oversight and enforcement of goals and standards, and increased local bureaucratic discretion. Vague policy goals and standards have been of little help in guiding program implementation and have contributed to local

222 Van Horn, p. 116.
bureaucrats governing the CDBG program in the absence of precise policy objectives.

As table three indicates, when asked to identify who has the most input into the grant decision making process, HUD and Department Development bureaucrats, and city council and citizen group members overwhelmingly identified the Columbus Department of Development.

Table 3
Perceptions of CDBG Decision Making

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<tr>
<th>Groups Responding</th>
<th>DOD</th>
<th>CDTF</th>
<th>CC</th>
<th>HUD</th>
<th>GROUPS</th>
<th>TOTAL</th>
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<td>27</td>
<td>6</td>
<td>5</td>
<td>32</td>
<td>92</td>
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</tbody>
</table>

*Figures represent the numbers of individuals per group choosing a specific response in answering the following question: "Who has the most input into the decision making process regarding the distribution of CDBG grant money and the selection of target areas?"

DOD=Department of Development
CDTF=Community Development Task Force
CC=City Council
HUD=Local HUD officials
GROUPS=Community and Interest Groups

The only exceptions to this pattern were eight CD Task Force members who perceived that the city council had the
most input. These eight Task Force members obviously recognized that the city council can alter any Task Force or Development Department recommendations. In reality, however, few meaningful changes were made. This research confirms that the Department of Development, with its technical expertise, information, staff, and monetary resources, has been the most important actor in the implementation of the Columbus CDBG program during 1983. Interviews with many actors involved in the implementation process and observations from community meetings confirmed the powerful role of street level bureaucrats. One CD Task Force member commented on the resources held by Development Department officials:

They have the most information, the staff, and resources to understand this program. We and city council members work full time jobs and don't have the staff or resources to acquire the expertise needed.

A senior Development Department official also believed that local bureaucrats have the greatest input on the grant decision process:

We present all the information to the CD Task Force and City Council. They then respond to our target area and budgetary recommendations. Very rarely are there changes made in our original policy proposals.

The CD Task Force is merely an advisory body and the city council does not have the time or staff to provide the empirical information that will challenge Development
Department recommendations. Because both the CD Task Force and city council must respond to Development Department recommendations, they are both reactive bodies. Although city council members have the final say over the grant application turned into HUD, they rarely alter Development Department recommendations unless a majority of Task Force members or a vocal citizen's group lobbies actively for a particular project. The effect of citizen participation on the governing process is discussed in chapter five.

In the absence of clear policy goals and standards, and active HUD oversight and enforcement, Columbus street level bureaucrats are afforded great discretion in the CDBG governing process. To understand the consequences of this bureaucratic governance for other aspects of program performance, it is useful to examine how the CDBG funds are used and who benefits from the implementation process.

How are the Funds Used?

The central issue confronting local program implementors during 1983 was the allocation of scarce program funds among competing neighborhoods and community and interest groups. The Columbus implementation climate was characterized by confusion and disagreement over the vague and conflicting policy goals and standards formulated at the national level. As a result of the Reagan reforms, HUD enforcement of national program objectives has been limit-
ed. This key aspect of the national policy environment has also fostered bureaucratic discretion, confusion, and conflict in the implementation of the Columbus CDBG program.

In this climate of conflict over program goals, the Columbus Department of Development presented the CD Task Force and later the city council with target area and program budgetary recommendations. Four target areas were chosen originally to be the center of CDBG activity over the next three years. These areas included Bellows, Harrison West, Milo Grogan, and Southside One. A fifth target area, Atcheson East, was later selected by the City Council after receiving the recommendation from both the CD Task Force and Development Department.

Throughout the target area selection process, the central issue was the criteria used by the Development Department to guide their recommendations. Criteria for selection was continually raised by CD Task Force members and members of community and interest groups. At one community meeting a leading Development Department official responded:

> In determining target areas, we consider the value of housing, census information, and we try to identify pockets in neighborhoods that are worse off than other parts of neighborhoods.

Yet members of the CD Task Force attacked this kind of analysis. One Task Force member argued:

> There are some fifteen neighborhoods that would qualify according to DOD's analysis. The problem
is that there are no explicit criteria for the selection of target areas and distinguishing between neighborhoods.

A city council member also said that there has been confusion over the criteria for selecting target areas:

They go on the greatest need. The group that screams the loudest, will get money also. I assume many factors come into play—the condition of housing, the neighborhood, the presence of an effective community organization, and the numbers of low and moderate income people. The City Council is hard pressed to change the recommendations of the DOD and CD Task Force.

Other Development Department bureaucrats and city council members readily admitted that areas in the greatest need of CDBG funds would not be chosen as target areas. As one city council member said: "Will there be a visible impact, or will it take a lot of money to improve the neighborhood?" When asked "what factors determine target area selection," a long time Development Department official responded:

The money goes to areas which are most able to be turned around. Most of the CDBG money goes to housing. We cannot deal with our most severe problems with the limited funds available.

In a time of scarce program resources, CDBG target areas have been chosen to insure that the money spent will have a "visible impact" on the target neighborhood. In the absence of clear program goals, and specific criteria for target area selection, local Development Department bureaucrats have enormous discretion in selecting CDBG target
areas. The impact of citizen participation in controlling this discretion and the role of the CD Task Force in the selection of target areas and the distribution of program benefits is the topic of chapter five. But before detailing the role of citizen participation in the Columbus CDBG implementation process, we must first consider who has benefitted from the distribution of program funds.

Who Benefits?

The important question of who has actually benefitted from the distribution of CDBG funds is difficult to answer empirically. As Van Horn suggests, "it is not possible to answer directly the question of who benefits from community development programs, because no one has undertaken the enormously difficult and costly task of collecting information on the characteristics of people who participate in various CDBG funded projects and services." Previous studies of the types of individuals benefitting from the CDBG program have all had serious shortcomings. Richard P. Nathan, who has coauthored the Brookings' evaluations of the implementation of the CDBG program, summarizes these methodological problems:

In general the prior studies used data by census tract and allocated CDBG projects according to the income characteristics of the census tracts in which they were to be located. These approaches failed to take into account the extent to which projects in lower-income areas benefit

223 Van Horn, p. 123.
higher-income persons, and vice versa. Likewise, insufficient attention was given to what was being observed (what kinds of benefits?) and to the definitions used for income groupings.\footnote{Richard P. Nathan, "The Methodology for Field Network Evaluation Studies." \textit{Studying Implementation: Methodological and Administrative Issues}, Walter Williams, ed. (Chatham, New Jersey: Chatham House Publishers, Inc., 1982), p. 90.}

The problem of vague and shifting legislative goals also hinders measuring accurately who benefits from the CDBG program.\footnote{See Nathan, p. 74.} The important issue of who comprises low and moderate income persons has never been clearly established. This factor alone makes it difficult to ascertain whether the legislative goal of aiding low and moderate income individuals is being reached satisfactorily.

The methodological shortcomings noted above make it difficult to address empirically the important question of who benefits from the implementation of the Columbus CDBG program. Yet differing perceptions regarding who has benefited and who should benefit from the CDBG program have led to implementation conflict between bureaucrats, CD Task Force members, city council members, and citizens.

The most recent grantee performance report submitted by the Development Department to HUD suggests that 88\% of CDBG funds spent in Columbus from August 1, 1982 to July 31, 1983, benefitted low and moderate income individuals. This report identifies all activities completed between August
1, 1982 through July 31, 1983, including many program and target area projects begun shortly after the creation of the CDBG program. Unfortunately, while the document provides a line by line description of each completed activity, it does not identify what criteria is used to determine whether low and moderate income individuals have benefitted from CDBG funded activities. Given this lack of clarity, it is difficult to view the 88% figure as an adequate measure of whether the Columbus CDBG program is aiding low and moderate income individuals.

During the 1983 grant application process, Development Department officials argued that the five new target area neighborhoods ranked among the lowest in terms of median household income. Yet using median household income as the key indicator, table four suggests that there were eighteen neighborhoods that had median household incomes less than the $11,000 median income in Southside One. This data provides empirical evidence to support the claims of those who argue that the neediest neighborhoods have not been chosen as target areas. It also supports the earlier conclusion that Development Department bureaucrats and city council members are more concerned with achieving visible impact with CDBG funds instead of aiding the most needy low income neighborhoods in a time of resource scarcity.

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### Table 4

**Median Household Incomes of Columbus Neighborhoods**

<table>
<thead>
<tr>
<th>Neighborhood</th>
<th>Median Household Income ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Addition</td>
<td>15,460</td>
</tr>
<tr>
<td>Arlington Park</td>
<td>15,176</td>
</tr>
<tr>
<td>Atcheson East</td>
<td>7,146</td>
</tr>
<tr>
<td>Bellows</td>
<td>8,450</td>
</tr>
<tr>
<td>Broadleigh North</td>
<td>8,737</td>
</tr>
<tr>
<td>Cassady Farm</td>
<td>20,056</td>
</tr>
<tr>
<td>Central Franklinton</td>
<td>7,900</td>
</tr>
<tr>
<td>Central Hilltop</td>
<td>12,850</td>
</tr>
<tr>
<td>Clarendon</td>
<td>12,499</td>
</tr>
<tr>
<td>Concerned</td>
<td>9,852</td>
</tr>
<tr>
<td>Driving Park</td>
<td>11,642</td>
</tr>
<tr>
<td>Duxberry</td>
<td>12,418</td>
</tr>
<tr>
<td>East Columbus</td>
<td>11,068</td>
</tr>
<tr>
<td>East Franklinton</td>
<td>5,798</td>
</tr>
<tr>
<td>Franklin Park</td>
<td>9,625</td>
</tr>
<tr>
<td>Garrison Park</td>
<td>not available</td>
</tr>
<tr>
<td>Harrison West</td>
<td>10,725</td>
</tr>
<tr>
<td>Hungarian Village</td>
<td>10,792</td>
</tr>
<tr>
<td>Idlewild</td>
<td>17,530</td>
</tr>
<tr>
<td>Lincoln Park</td>
<td>10,520</td>
</tr>
<tr>
<td>Livingston Park</td>
<td>9,747</td>
</tr>
<tr>
<td>Marion Franklin</td>
<td>17,370</td>
</tr>
<tr>
<td>Milo-Grogan</td>
<td>8,813</td>
</tr>
<tr>
<td>Mt. Vernon South</td>
<td>5,085</td>
</tr>
<tr>
<td>North Columbus</td>
<td>10,859</td>
</tr>
<tr>
<td>North Linden C</td>
<td>13,750</td>
</tr>
<tr>
<td>North Linden E</td>
<td>12,905</td>
</tr>
<tr>
<td>North Linden W</td>
<td>14,192</td>
</tr>
<tr>
<td>North of Broad</td>
<td>10,026</td>
</tr>
<tr>
<td>Olde Towne East</td>
<td>6,942</td>
</tr>
<tr>
<td>Rainbow Addition</td>
<td>16,562</td>
</tr>
<tr>
<td>Reelf-Hcsack</td>
<td>8,647</td>
</tr>
<tr>
<td>Shepard</td>
<td>14,659</td>
</tr>
<tr>
<td>Sorento W</td>
<td>14,620</td>
</tr>
<tr>
<td>South Linden</td>
<td>not available</td>
</tr>
<tr>
<td>South of Main</td>
<td>9,710</td>
</tr>
<tr>
<td>Southeast Civic</td>
<td>14,458</td>
</tr>
<tr>
<td>Southside I</td>
<td>11,000</td>
</tr>
<tr>
<td>Southside II</td>
<td>12,309</td>
</tr>
<tr>
<td>Southwest Hilltop</td>
<td>17,250</td>
</tr>
<tr>
<td>Starbaugh</td>
<td>12,564</td>
</tr>
<tr>
<td>Stockbridge East</td>
<td>18,125</td>
</tr>
<tr>
<td>Sullivant Gardens</td>
<td>7,470</td>
</tr>
<tr>
<td>Town Franklin</td>
<td>5,917</td>
</tr>
<tr>
<td>Triangle</td>
<td>8,718</td>
</tr>
<tr>
<td>Unity</td>
<td>6,947</td>
</tr>
</tbody>
</table>
The lack of clarity in describing who comprises low and moderate income individuals, and the methodological weaknesses of using census tract level information to ascertain median household income are the two key reasons why the important question of "who benefits" cannot be answered satisfactorily. Yet perceptions of who has benefitted can be addressed. Interviews with local implementation actors provided conflicting perceptions over who has benefitted from the Columbus CDBG program. This conclusion is supported by the seven point scale presented in table five. Table five reveals remarkable overall agreement among implementation actors regarding the perceived effectiveness of the Columbus CDBG program. It is interesting to note,

In his study of the CDBG program, Van Horn suggests that "census tracts are often very often heterogeneous because they can encompass a large area and contain average populations of around 4,000. Consequently, assigning benefits by geographic area may overestimate or underestimate the benefits to various income groups if only a small proportion of the tract's population actually gains from it. Finally, some projects, such as housing rehabilitation, may be designed to eventually benefit nonresidents with income levels that differ from income levels in the census tract's population. Thus the analysis of short-term benefits obscures the long-run impact of the projects," Van Horn, pp. 124-25.
### Table 5

**Perceived Effectiveness of Columbus' CDBG Program**

<table>
<thead>
<tr>
<th>Evaluation Indicators</th>
<th>DOD (N=22)</th>
<th>CDTF (N=27)</th>
<th>CC (N=6)</th>
<th>HUD (N=5)</th>
<th>GROUPS (N=32)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assist low/mod. income</td>
<td>4.6</td>
<td>4.9</td>
<td>4.8</td>
<td>5.6</td>
<td>3.8</td>
</tr>
<tr>
<td>Eliminate slums/blight</td>
<td>4.4</td>
<td>4.2</td>
<td>3.5</td>
<td>4.7</td>
<td>5.1</td>
</tr>
<tr>
<td>Citizen Part. (past years)</td>
<td>4.7</td>
<td>4.5</td>
<td>3.8</td>
<td>5.4</td>
<td>5.3</td>
</tr>
<tr>
<td>Citizen Part. (this year)</td>
<td>4.8</td>
<td>4.5</td>
<td>5.3</td>
<td>5.5</td>
<td>3.9</td>
</tr>
<tr>
<td><strong>Mean</strong></td>
<td><strong>4.6</strong></td>
<td><strong>4.5</strong></td>
<td><strong>4.4</strong></td>
<td><strong>5.3</strong></td>
<td><strong>4.5</strong></td>
</tr>
</tbody>
</table>

DOD=Department of Development  
CDTF=Community Development Task Force  
CC=City Council  
HUD=Local HUD Officials  
GROUPS=Community and Interest Groups

The range for each measure is from 1 to 7, with 7 being the most positive response (extremely effective) and 1 being the least favorable response (not at all effective).

However, some key differences. The six city council members had the most negative perception of the program's effectiveness in eliminating slums and blight. This is not surprising given that the council members, elected at large every two years, must confront the problems of slums and blight in their re-election campaigns. On the other hand, community group members had the most positive perception of the program's effectiveness in eliminating slums and blight. Group members whose areas have received CDBG dollars likely recognized the positive effect that these grants have had on specific Columbus neighborhoods. Yet it
is also interesting to note that community group members separated assisting low and moderate income residents from eliminating slums and blight. Community group members had the most negative perception of the Columbus CDBG program's effectiveness in aiding low and moderate income residents. This is not surprising given that the most divisive issue of the 1983 implementation process was the conflict between implementation actors over whether CDBG dollars should be used for distributive or redistributive purposes.

The seven point scale also reveals differing city council and community group perceptions regarding the perceived effectiveness of citizen participation. City council members perceived a dramatic increase in the effectiveness of citizen participation this year when compared to previous years, and community group members perceived a dramatic decline in the effectiveness of citizen participation this year. City council members likely based this perception on their view that they were contacted by citizens during the grant application process and allocated grant dollars to meet citizen's needs. Community group members, however, likely perceived that the Development Department, CD Task Force, and City Council were unwilling to respond to their concerns in the 1983 grant application process. In a time of increased resource scarcity, it is not surprising that community group members viewed citizen participation as less effective this year when compared to previous years.
Finally, while table five reveals remarkable overall agreement, it also indicates that the five HUD officials had the most positive perception of the overall effectiveness of Columbus' CDBG program. This finding is interesting because the HUD officials were the group farthest removed from program implementation. The Reagan reforms reduced federal enforcement and oversight considerably. As a result, HUD officials had the least amount of detailed information of the five groups regarding the 1983 grant application process. Perhaps HUD officials offered an unrealistic picture of overall program effectiveness.

According to a number of CD Task Force members and community activists, the goal of aiding low and moderate income individuals is not being reached. One member of the Task Force concluded:

If the goal of the program is to aid low and moderate income people, it is not being reached. Too many projects are being set up for non-low and moderate income people. One guy told me that since he lives in a target area, he will apply for a 3% loan and use it even though he makes $35,000 a year.

Another CD Task Force member said that under Reagan, there will be major changes in who benefits from the CDBG program:

I thought that the goal of the program was to help low and moderate income neighborhoods with rehabilitation. Until Reagan, we were effective in meeting this goal. But now we are moving away from low and moderate income. Instead, the focus is on economic development which will benefit the middle and upper classes.
When asked why specific target areas were selected, one long time community activist linked this selection to a lack of concern on the part of decision makers in aiding low and moderate income individuals:

Because certain people hollered the loudest on the Task Force. It's politics, honey. The city is supposed to be for all of the people. Yet the city gives out money to affluent areas and ignores low income people in need.

The target area selection process and the emphasis on economic development activities were major sources for dispute during the 1963 grant application process. The wisdom of using the target area approach was also criticized by community members. Those arguing against using target areas believed that low income residents who did not live in a chosen target area would be ineligible for CDBG benefits. One community activist said:

I don't agree with the selection of target areas. The money has been in the same target areas during the last eight years. The money has to go citywide. I am worried that certain low income people won't get money under the target area approach.

Another citizen group member also attacked the target area approach because it ignores the concerns of low income individuals and fosters conflict between needy neighborhoods over scarce funds:

I disagree with the target area approach because it sets up little fiefdoms and clouds the real issue of inequality between neighborhoods. It is used for political purposes so DOD, the Task Force, and City Council can say that they have had an impact. What it really does is force low
income neighborhoods to compete against each other for limited dollars.

While members of the CD Task Force and community activists often attacked target area selection and the emphasis on economic development, Development Department officials and city council members believed that these two characteristics of the Columbus CDBG implementation process would ultimately aid low and moderate income individuals. Most long time bureaucrats who have used both the broad program area approach of the 1970's and the current target area concept believe that target areas will aid low income individuals more directly. When asked to identify the strengths and weaknesses of the target area approach, one senior Development Department official responded:

I like the target area approach because you can do more to aid low and moderate income people in more concentrated target areas than in the broad program areas.

A Development Department planner also identified the advantages of using target areas to aid low and moderate income individuals:

I like using target areas because we can have an observable impact over a three to five year period. We can build on things done in the past and relate to the neighborhood. Yes, the goals of aiding low and moderate income are being reached in target areas such as South Linden.

At a March 1983 community meeting, a senior Development Department official argued that the target area approach and economic development activities that characterized the
three year plan submitted to HUD would aid low and moderate income residents:

Over the next three years we have some outstanding commitments in our target areas. We hope to complete these things. We will also address those smaller targeted areas of need within new target areas that have to be dealt with. There will be an expansion of citywide activities and an emphasis on economic development in order to aid low and moderate income residents over the long term.228

The immediate response of one long time community activist to this description reveals the conflict over economic development funding:

Economic development money makes the rich richer and the poor poorer. Community development money should not be used to fund economic development activities.229

This conflict between Development Department bureaucrats, who contend that the Columbus CDBG program is distributive policy,230 and CD Task Force members and citizen activists, who argue that the program should be redistributive,231 was

228 Community Meeting, Columbus, Ohio, March 16, 1983.
229 Community Meeting, Columbus, Ohio, March 16, 1983.
230 According to Ripley and Franklin, "distributive policies and programs are aimed at promoting private activities that are said to be desirable to society as a whole and, at least in theory, would not or could not be undertaken otherwise. Such policies and programs provide subsidies for those private activities and thus convey tangible governmental benefits to the individuals, groups, and corporations subsidized." Randall B. Ripley and Grace A. Franklin, Congress, the Bureaucracy, and Public Policy revised edition (Homewood, Illinois: Dorsey Press, 1980), p. 21.
231 Ripley and Franklin contend that "redistributive policies and programs are intended to manipulate the allo-
a key characteristic of the 1983 grant application process. Ultimately, disagreements over the use and selection of target areas, the emphasis on economic development activities, and who benefits from the implementation process emanate from this fundamental conflict between distributive and redistributive visions of public policy. The conflict is fostered by the Housing and Community Development Act of 1974 and the Reagan reforms of 1981, as vague and unclear legislative goals and standards, and the lack of HUD enforcement, has encouraged street level bureaucratic decisionmaking regarding whether to emphasize the distributive or redistributive aspects of the CDBG program. The 1983 Columbus grant application process reveals that more local implementation conflict is likely in the future as citizens attempt to counteract bureaucratic discretion during a time of increased resource scarcity. Citizen participation is the principal means open for citizens to affect public policy decision making in a democratic society. The forms of participation and the extent to which citizens affected the selection of target areas and distribution of program benefits during the 1983 Columbus grant application process is assessed in chapter five, and the implications of this par-

ipation of wealth, property rights, or some other value among social classes or racial groups in society. The redistributive feature enters because a number of actors perceive there are "winners" and "losers" in policies and that policies transfer some value to one group at the expense of another group," Ripley and Franklin, p. 25.
CONCLUSIONS

The evaluation of the 1983 Columbus CDBG implementation process confirms the value of using the bureaucratic discretionary model as a guide to implementation research. Specifically, the Van Meter and Van Horn conceptual implementation framework has been reinforced by the following conclusions:

1. In the absence of clearly communicated legislative goals and standards, street level Development Department bureaucrats have the discretionary power to make the important decisions regarding the selection of target areas and the distribution of CDBG program benefits.

2. Key implementation actors hold conflicting views regarding the policy's standards and objectives; this has led to conflict in the implementation of the Columbus CDBG program.

3. The Columbus HUD office has played a limited oversight and enforcement role, and this has fostered bureaucratic discretionary decisionmaking in the absence of clearly defined legislative objectives and standards.

4. The Columbus CDBG program is being implemented in an environment of resource scarcity that has contributed
to conflict between implementation actors over who governs, how the funds are used, and who benefits. This conflict is likely to be exacerbated in the future as resources become more scarce and various neighborhoods fight against each other for limited program benefits.

5. The Development Department has received strong political support from the mayor and city council and this has aided the local implementation process.

6. Development Department bureaucrats are the principal implementation actors because they possess the resources, staff, and time that is needed to implement the Columbus CDBG program.

7. Unclear criteria for the selection of target areas and the distribution of program benefits has led to implementation conflict at the local level.

8. Due to methodological shortcomings, it is not possible to ascertain empirically whether the goal of aiding low and moderate income groups is being reached satisfactorily. Interviews with local implementation actors revealed conflicting views regarding the redistributive aspects of the CDBG program. Development Department bureaucrats, HUD bureaucrats, and city council members believe that the city is making a determined attempt to achieve this goal, while members
of the CD Task Force and community and interest group members believe that low income groups have been ignored in the distribution of CDBG program benefits.

9. The 1981 Reagan reforms have affected the Columbus CDBG implementation process in a number of ways. There has been a return to the "hands off" federal government role that characterized the Ford era. As a result of the Reagan reforms, there is an emphasis on using CDBG funds for distributive purposes (e.g. economic development activities) rather than directly aiding low and moderate income individuals. The Reagan reforms have also led to a perception of increased resource scarcity as federally funded programs, such as CETA, have been cut considerably. All of these reforms foster increased bureaucratic discretionary decisionmaking in the absence of clear legislative goals and standards, and limited enforcement and oversight by HUD.
Chapter V

THE IMPLEMENTATION OF CITIZEN PARTICIPATION

As chapter four reveals, there are several themes that emerge from this study of the Columbus implementation process. First, the Reagan reforms have led to increased local bureaucratic discretionary decisionmaking in the absence of clear program goals and enforcement by HUD. Second, the Columbus CDBG program is being implemented in an environment of resource scarcity which has fostered increased conflict between implementation actors over who should govern, how the funds should be used, and who should benefit. Finally, this conflict is likely to continue in the future as the Columbus citizenry, elected officials, and Development Department bureaucrats disagree over the distributive and redistributive aspects of the CDBG program.

For the Columbus citizenry, the citizen participation element of the CDBG program is the means for articulating their views regarding program implementation. According to Susan and Norman Fainstein, the process wherein citizens can influence program implementation is bureaucratic
enfranchisement.232 Citizens have input into the Columbus decision making process in three different ways: 1) by contacting their Community Development Task Force representative, 2) by attending community meetings, or by 3) joining a neighborhood organization or interest group to lobby elected officials and Development Department bureaucrats.

The purpose of this chapter is to assess critically the implementation of the Columbus CDBG citizen participation process. Data is provided based on observations at community meetings, examinations of documents, and personal and telephone open-ended interviews with Development Department bureaucrats, HUD officials, city council members, CD Task Force members, community group representatives, and citizens. The following questions are addressed:

1. What factors have affected the implementation of citizen participation in the Columbus CDBG program?

2. How have the Reagan reforms affected the implementation of citizen participation in the Columbus CDBG program?

3. What are the forms of bureaucratic enfranchisement open to the Columbus citizenry in the CDBG implementation process and which type is most effective in affecting decisions regarding the distribution of pro-

The implementation of citizen participation in the Columbus CDBG program

The Van Horn model of intergovernmental policy implementation guides this assessment of the implementation of citizen participation. This portion of chapter five examines elements of the policy standards and resources, and the national policy environment which affect citizen participation. Three key questions guide this assessment of the impact of citizen participation in the local policy environment on program performance: who governs?, how are the funds used?, and who benefits?
Degree of Clarity, Contradictions, and Specificity in Policy Standards and Objectives

Since the inception of the CDBG program in 1975, the implementation process has been characterized by confusion over the precise role that the citizenry should play in the grant application process and the distribution of program benefits. As Dommel suggests, the problem is the lack of clarity in the original CDBG legislation:

In providing for citizen participation in the decisionmaking process, the CDBG legislation was less specific than the urban renewal and model cities program on who the citizens would be and how this participation would be organized.233

Specifically, the original legislation stated that the CDBG program application process must provide "maximum feasible priority" to low and moderate income persons. This ambiguous language contributed to implementation problems at the local level as there was confusion over the meaning of "maximum feasible priority." Because some HUD officials viewed this clause as vague program rhetoric rather than as a program requirement, HUD refused to enforce actively the notion that low and moderate income citizens should be actively involved in the grant application process.234 Hence, in the absence of clear program standards, local bureaucrats practiced discretionary decisionmaking regarding the citizen participation element of the CDBG program.

233 Dommel, p. 46.
234 Rosenfeld, p. 220.
The 1977 Carter administration reforms were designed to make more explicit the provision that low and moderate income residents should participate in the grant application process. Specifically, the Housing and Community Development Act of 1977 required that communities must adhere to a written citizen participation plan that requires that citizens be afforded the opportunity to participate in the development of the grant application submitted to HUD. The new legislation also mandated that citizens should be given the "opportunity to comment on their community's performance." Residents of low and moderate income neighborhoods were particularly encouraged to participate in this process.\textsuperscript{235} While the procedural requirements for citizen participation were clearly strengthened by the 1977 act, the act did not identify how citizen participation would be implemented. Also, the legislation emphasized the advisory nature of citizen participation, rather than stressing active, substantive participation. The Carter administration desired increased participation by low and moderate income citizens. But the administration's legislative reforms fostered bureaucratic discretion regarding the citizen participation process in the absence of detailed standards.\textsuperscript{236}

With the Reagan administration reforms of 1981, there was a marked de-emphasis on citizen participation. The revised legislation eliminated two requirements: that low and moderate income citizens be encouraged to participate in the grant application process; and that there must be a citizen participation plan. The Reagan reforms weakened considerably the requirements for citizen participation and permitted localities to implement citizen participation in accordance with local needs.

As chapter three suggests, Columbus has consistently exceeded the limited statutory requirements for citizen participation. During the eight years of CDBG program implementation, citizens have attended city-wide and neigh-

236 But as chapter two suggests, a HUD study revealed that the Carter reforms did lead to increased participation by low and moderate income residents. HUD also found that the adoption of the Housing and Community Development Act of 1977 led to more low and moderate income residents receiving CDBG grants.

237 The Reagan reforms included these basic citizen participation requirements for grantees: a) Furnish citizens information concerning the amount of funds available for proposed community development and housing activities and the range of activities that may be undertaken; b) Publish a proposed statement in such manner to afford affected citizens an opportunity to examine its content and to submit comments to the grantee on the proposed statement and on the community development performance of the grantee; c) Hold one or more public hearings to obtain the views of citizens on community development and housing needs; and d) Consider any such comments and views on preparing the statement and may, if deemed appropriate by the grantee, modify the proposed statement, and make the final statement available to the public. HUD Notice, 81-13, October 14, 1981 (Washington, D.C.: U.S. Government Printing Office), p. 10.
borhood meetings held by the Development Department, city council, and the CD Task Force. After the Housing and Community Development Act of 1977 was enacted, the Development Department opened the grant application process to more citizen input. The Community Development Task Force was created in 1978 and has been the formal citizen participation vehicle since that time. Since the inception of the CDBG program in 1975, citizen participation has been achieved with the participation of advisory committees, neighborhood-based groups, interest groups, and interested citizens in the formation of the CDBG application and community development plan.

The 1983 Columbus citizen participation process was characterized by citizen input throughout grant application formulation. Despite the Reagan reforms, Columbus still published a citizen participation plan and held city wide hearings prior to the selection of target areas. Once target areas were selected, two or three meetings were then held by Development Department planners in the target areas to obtain citizen input regarding where and for what purposes the CDBG money should be spent. Citizens also had an opportunity to express their concerns before city council and could contact Development Department bureaucrats. In short, Columbus has chosen to maintain citizen participation opportunities despite the Reagan reforms.
Interviews with Development Department bureaucrats revealed that citizen participation has become institutionalized in Columbus and will be difficult to eliminate:

Once you have citizen participation in place, it is very difficult to take it away. The Reagan administration is trying to rid of citizen participation, but won't succeed in Columbus because we are committed.

Most cities have continued with citizen participation under Reagan. It is hard to eliminate citizen participation once you have started.

City council members also supported Columbus' commitment to citizen participation despite the Reagan reforms. In fact, most council members believed that there was actually more citizen participation in the 1983 grant application process than in previous years:238

I have not noticed any changes in the overall implementation of the program. I believe that if anything, there is more citizen participation now.

Under Reagan, there is reduced paperwork and red tape. There is more flexibility for localities. Columbus has a vigorous citizen participation process. It is difficult to take citizen participation away once you have started it.

While most Development Department bureaucrats and city council members believed that the Reagan reforms have not affected citizen participation, others disagreed. One Development Department official directly involved with the citizen participation process commented:

238 See table five in chapter four.
Overall, the program is less structured under Reagan. A lot of federal requirements have been dropped in terms of citizen participation and eligibility. The program has become a lot more discretionary. Citizens now have less input throughout the process.

A number of Community Development Task Force members and citizens supported this point of view. When asked, "are there problems in implementing citizen participation in Columbus?" one Task Force member responded:

The Reagan reforms and the overall vagueness of the legislation hinders effective participation. I have noticed that there is less overall participation this year compared to last year.

A citizen activist argued that despite the increased number of citywide meetings and hearings, there has been little change in the impact of citizen participation due to the symbolic nature of this participation:

The city said that the process would be more open this year. There have been more meetings but no real change in the impact of citizen participation on who gets what.

This perception is important because it underscores that citizen participation may be merely symbolic participation and work to merely preserve the status quo.

Interviews revealed conflicting views regarding the impact of the Reagan reforms. Bureaucrats and city council members generally argued that Columbus has continued its commitment to citizen participation. CD Task Force members and citizens were more inclined to conclude that the Reagan reforms fostered an overall reduction in citizen participa-
tion as reflected in the 1983 grant formulation process. These findings are not surprising given that CD Task Force members and citizens perceived that citizen participation has been the principal means for affecting the distribution of program benefits.

Controversy and conflict over the participation of low and moderate income residents has characterized the Columbus implementation process since the inception of the program eight years ago. The 1983 grant application process was no exception as numerous CD Task Force members and citizens complained that the concerns of low and moderate income citizens were not heard in the citizen participation process. The CD Task Force is the primary participatory mechanism available to low and moderate income citizens and has representatives from low and moderate income neighborhoods such as South Linden, Milo Grogan, and Harrison West. But several low income areas— including Weinland Park, Triangle, Franklin Park, and Broadleigh North—are not even represented on the CD Task Force.239 From the vantage point of various implementation actors, this lack of low income neighborhood representation on the formal citizen participation body suggests that certain low income citizens have little chance to obtain CDBG funds.

239 See table four in chapter four.
One CD Task Force member from a low income neighborhood identified a key weakness of the Task Force and offered a possible explanation for the exclusion of many lower-class participants:

The Task Force is comprised of middle and upper class people protecting their own neighborhood interests. Poor people are poorly represented on the Task Force.

A city council member also cited the problem of CD Task Force membership:

The CD Task Force is not as representative as it might be. As a result, it has not adequately served low income people. We need more low income citizens on the Task Force.

The vague CDBG legislation ignores the important issues of who comprises low and moderate income individuals and how these citizens should participate in the CDBG implementation process. In the absence of clear policy standards, it is not surprising that Columbus Development Department bureaucrats have created a formal citizen participation mechanism that does not adequately represent the concerns of low and moderate income citizens. The 1981 Reagan reforms have led to a further de-emphasis on the participation of low and moderate income residents in the Columbus grant application process. The forms of participation open to low and moderate income residents and their perceived effect upon program implementation will be discussed when the dependent variable—program performance—is considered later in this chapter.
Communication and Enforcement—The Role of HUD in the Citizen Participation Process

The preceding discussion highlights the lack of communication between federal officials and Development Department bureaucrats regarding the "maximum feasible participation" element of the CDBG legislation. Interviews with long time HUD bureaucrats and Development Department officials revealed that during the first three years of the CDBG implementation process, HUD merely reviewed the Columbus citizen participation process and did not actively enforce the "maximum feasible participation" provision. With the 1977 Carter reforms, the Columbus HUD office played a more active role in evaluating citizen participation. In particular, HUD scrutinized the grant application process before distributing program benefits to insure that low and moderate income citizens had adequate opportunity to participate in the formulation of the grant application. HUD also examined carefully the citizen participation plan. The 1981 Reagan reforms led to a reduction in HUD oversight. HUD no longer reviews the Columbus citizen participation plan, and does not scrutinize the opportunities for low and moderate income citizen participation. When asked, "do you have any responsibilities with respect to the implementation of the citizen participation element of the CDBG program in Columbus?" one HUD official responded:
We review it. We have no problem with the Columbus citizen participation process. The city hasn't changed its process since the Carter reforms.

Another long time HUD official offered a more negative perception of the Columbus citizen participation process:

After the Carter reforms, the city was genuine and sincere in getting the opinions of citizens. But now there is a definite change. The city rarely changes the Development Department's initial funding recommendations. Citizens, especially low income citizens, have little input. As a result of the Reagan reforms, we no longer have control over citizen participation.

Without active HUD oversight and enforcement, Columbus Development Department bureaucrats have implemented citizen participation in accordance with local needs rather than original federal objectives. The 1983 Columbus citizen participation process extended far beyond the limited HUD requirements, but interviews with implementation actors and observations at community meetings revealed a genuine concern that the quality of participation has decreased, and the views of low and moderate income residents have not been represented adequately. In the absence of HUD oversight and clear program standards, it is unlikely that these perceived problems will be remedied in the future.
Attitudes and Dispositions of Local Political Officials and Administrators

Interviews with local implementation actors revealed the conflicting views of Development Department bureaucrats, city council members, and CD Task Force members regarding the citizen participation element of the CDBG program. Development Department bureaucrats were less supportive of citizen participation, while city council and CD Task Force members expressed support for citizen involvement in the CDBG grant application process.

To several Development Department bureaucrats, citizen participation hindered effective program implementation. When asked "what has been the impact of citizen participation on the implementation of the CDBG program in Columbus?", one Development Department official responded:

Citizen participation is a pain in the ass. The objective of bureaucrats is to minimize controversy. People are so adamant in their distrust of the city that it has destroyed the atmosphere of openness.

Another bureaucrat described the limitations of citizen participation:

If you let citizens make target area decisions, the decision would never be made—you must let professionals make these important decisions. Citizen participation has to stop someplace.

When asked, "are there problems in implementing the citizen participation element of the CDBG program in Columbus?" a senior Development Department official argued:
There will never be citizen participation. Citizens should not participate. We have a citizen's bureaucracy in the CD Task Force. You see the same people at the meetings say the same things over and over again—it gets dull and boring.

While most Development Department bureaucrats cited implementation problems associated with citizen participation, several admitted that the Development Department has worked to solicit the views of the Columbus citizenry:

The Department has bent over backwards to give lip service. The citizens have to participate. I am impressed by the commitment of citizens.

Citizen participation makes my job easier. I favor citizen participation and we have tried to obtain citizen input through the years. You do a better job if you are implementing things citizens want, allow citizens to participate and allow citizens to see other's problems. My fear is that given that human nature is what it is, citizens will only think of themselves.

In a personal interview, Mayor Moody offered an endorsement of the Columbus citizen participation process and cited three reasons to support his point of view:

It tends to confirm the value of professional work already done. It provides a political forum for understanding the process as citizens get a perspective that others need things too. The citizen participation process is also a window to the world for city council. I feel that honest citizens, as they become informed, will make the same decisions that honest professionals make.

The mayor's positive perception is not held by most Development Department bureaucrats, and these conflicting perceptions have fostered conflict between bureaucrats and citizens over the Columbus citizen participation process.
While city council members generally supported the mayor and CD Task Force members regarding the virtues of citizen participation, they did not openly criticize the Development Department's citizen participation process. Telephone interviews with city council members revealed strong support for citizen participation in the Columbus CDBG application process. Two council members endorsed citizen participation because it worked to build consensus:

Citizen participation as a consensus building process has a meaningful impact. If you don't have citizen participation, the program won't work.

Citizen participation has had a substantial impact in building consensus. It is very valuable. We need even more citizen input.

Another council member argued that the 1983 Columbus grant application process was characterized by a noticeable reduction in citizen participation and citizen input. He offered several reasons for this conclusion:

Citizen participation is down across the board for a number of reasons. The Reagan reforms certainly have not helped local citizen participation efforts. There has also been a growing cynicism and apathy on the part of the people. They feel they can't influence decisions. People can't attend meetings because of high unemployment. People who have been involved in the past are just too burned out from too many meetings.

While this council member painted a negative view of Columbus citizen participation during 1983, he did not criticize the Development Department's citizen participation strategy. Instead, he blamed the Reagan reforms and larger
social and economic conditions. Like other city council members interviewed, he confirmed the importance of having a viable citizen participation effort. It should not be surprising that city council members are more vocal advocates of citizen participation than Development Department bureaucrats. Every four years council members must be re-elected by the Columbus citizenry, while Development Department bureaucrats secure their positions by political appointment.

Like city council members, CD Task Force members viewed citizen participation as an integral component of the grant application process. One long time Task Force member said:

A lot of it has to do with attitude. Neighborhoods are viewed as adversaries on the part of the city. We need a partnership. Columbus has decreased the power of neighborhoods and increased the power of bureaucrats.

Many Task Force members reinforced the importance of citizen participation for holding bureaucrats accountable to Columbus residents. A senior Task Force representative offered a typical response:

There has always been a tension between the role of the city and the neighborhood. Some neighborhood advocates say that the city should have no role. I disagree. But citizen participation is also needed to keep elected officials and bureaucrats accountable.

The issue of bureaucratic accountability is considered more critically later in this chapter when the impact of citizen participation on program performance is detailed.
The importance of bureaucratic, city council, and Task Force attitudes regarding citizen involvement for program implementation cannot be underestimated. The differing perceptions held by implementation actors regarding the proper role of the Columbus citizenry, led to conflict in the 1983 grant formulation process.

Attitudes of Interest Groups and Citizens

This section details the attitudes of community and interest group members and citizens regarding citizen participation and the grant application process. Interviews with members from these three groups revealed an overall dissatisfaction with the citizen participation process and the implementation of the Columbus CDBG program.

Various community and interest group members who attended Development Department, Task Force, and city council meetings questioned the city's sincerity in obtaining meaningful citizen participation during 1983. Two long time

240 This conclusion for community and interest group members is supported by table five in chapter four. When asked to assess the effectiveness of Columbus' CDBG program in achieving citizen participation during the 1983 grant application process, community and interest group members responded with a mean average score of 3.9 compared to their mean average score of 5.3 for citizen participation in previous years. As table five suggests, this 3.9 score is considerably lower than the scores for the other four responding groups.

Citizens who attended specific community meetings in target areas were not asked to respond in this manner. Instead, citizens were asked more qualitative questions regarding citizen participation. Conclusions drawn are based on responses to these open ended questions.
Community organizers were very critical of the process:

The city is not interested in doing it. The hearings are always downtown and it is difficult for people to attend. People don't understand the process clearly. The city wants certain kinds of outcomes. The city has a strategy they want regardless of citizen participation.

The basic attitude of the city government and power structure is against it. The trappings are there, but they are not effective.

A long time interest group representative argued that Columbus political officials feared meaningful citizen participation because it will hold them more accountable to the citizenry:

The general attitude on the part of city government to neighborhoods is that average citizens should not participate. Politicians would be held more accountable. We must have meaningful participation. People must see that their participation has made an impact.

One community group representative, who attended citizen participation hearings for the first time during 1983, criticized the Development Department and CD Task Force members:

They were supposed to listen, but they appeared to listen and then did what they damned well pleased. Citizen participation made little difference.

While almost all citizen and interest group members attacked the citizen participation process, several members of the Columbus business establishment argued that community meetings are meaningful because they provide citizens with a forum to articulate their views:
Citizen participation eliminates the argument that you are spending the money without giving us the opportunity to have their say. It is definitely meaningful.

The CD decision making process is definitely open, because citizen participation is encouraged. The Development director has been receptive to listening to various groups.

One area businessman believed that the decision making process has been too open to citizen participation. When asked, "are there problems in implementing the citizen participation element of the Columbus CDBG program," he commented:

It is a mandate that you do. The problem with the mandate is that citizen participation must occur in the downtown area. People don't live in my area, so they should not participate. Neighborhood groups are upset because they view the money going to downtown as being taken away from their areas. There is a great deal of competition over limited dollars because the money is undesignated and there are vague program goals.

Others were much more supportive of citizen participation.

One visible citizen group activist offered a typical response:

Citizen participation is vitally important in that it is the only check there is. There is no other force for the communities. During 1983 citizen participation has been a much less positive thrust. We need more low income citizen involvement.

When asked "if there was no citizen participation, would the outcome have been any different?," an area commission leader responded:

Yes. Because you would have bureaucrats make decisions. From a democratic standpoint, it is better to have the community involved.
For virtually all community and interest group members interviewed, citizen participation was a vital component of the CDBG grant formulation process. Community and interest group member's perceptions of citizen participation's impact on overall program performance is considered later in this chapter. But before examining that impact, the perceptions of those citizens participating in specific community meetings need to be considered.

Interviews with citizens who attended community meetings in the Bellows, Southside One and Harrison West target areas revealed conflicting views regarding their participation and the overall CDBG participation process. After the selection of specific target areas, Development Department planners and other DOD officials were sent to community meetings to meet area residents. Citizens had the opportunity to articulate their views regarding where and for what purposes CDBG grants should be used. In all three areas a number of citizens were dissatisfied with the Development Department's responses. After attending two meetings in Southside One, a citizen commented:

I got the feeling that they had their minds made up before they got there. They are going to do what they want regardless of what we say at the meetings.

When asked "do you feel that citizen participation in the CDBG program is an effective means for citizens like you to have input into the grant distribution process?" a Harrison West resident responded:
I don't. Things are planned by DOD. They had their minds made up where they would use the money before the meeting started. I don't think our participation will change their minds.

A citizen who attended the second Southside One meeting offered a cynical view of his participation:

I am glad to have the opportunity to present my views, but I'm cynical about the effect of my participation. DOD is just going through the motions and will do what they want to do anyway.

The perception that the Development Department would ignore the citizenry's suggestions is a central theme of many of the responses. After attending both Harrison West meetings, a citizen concluded:

No, they didn't respond to people's needs in light of the first meeting. They never take my suggestions. They do what they want to do. I think a lot of things go on under the table.

The quality of the meetings also disturbed several residents. One Harrison West resident complained:

Not really. I am disappointed that more information is not given out. Every meeting they say they will talk about it at the next meeting. They started at 7:20 instead of 7:00. To me, they are looking out for themselves.

The feeling that the Development Department was not genuinely concerned with the needs of area residents pervaded many responses.

But some citizens attending the community meetings perceived that Development Department representatives wished to respond to the citizenry's needs. A Harrison West resident said:
Yes, from my dealings with the Department of Development it seems like they are concerned about our area. People at DOD are accessible and want to hear your point of view.

Another Harrison West resident who attended both meetings offered a favorable assessment:

I was really impressed because the Department of Development members were concerned about what was going on.

Other residents who had no previous opinions regarding the Department of Development and the CDBG program developed a positive impression after attending the area meetings. One Southside One citizen offered a typical response:

I didn't have any definite ideas before. But yes, I have a more positive view now. I thought the Department of Development representatives handled themselves very well at last Tuesday's meeting.

For some citizens, the area meetings were a valuable education forum. When asked, "has your attending the community meetings affected your views regarding the CDBG program?," several citizens responded by stressing the education function:

Yes. Some things I had never looked at. Those meetings helped me understand other people's needs and the program.

I didn't know much about the program beforehand. But I have a much more positive view now.

Yes. Now I am more informed regarding the program.

To other citizens, participation is important in a democratic society. These citizens also perceived that their
participation would affect the distribution of program benefits:

There must be citizen participation if the program is to benefit all of us. We must talk some of these ideas out. Everyone needs to voice their opinions.

Everyone should be concerned citizens. People have no right to gripe if they don't go.

I enjoy doing stuff on the neighborhood scale. There is something about this level that is good for everybody because it gives you a sense of community.

Citizens have to have input. The city does not know the needs of the community unless we participate.

More citizen participation means that the interest is there. It will affect how much money comes to our neighborhood in the future.

These citizens' comments are intriguing because they reveal positive perceptions of area community meetings and citizen participation. The implications of these perceptions for democratic theory and policy implementation at the local level are discussed in chapter six. But the important empirical issue in this chapter is the impact of citizen participation on CDBG program performance. The next section addresses this issue by examining the effect of citizen participation on three key questions: who governs?, how are the funds used?, and who benefits?
THE DEPENDENT VARIABLE: THE IMPACT OF CITIZEN PARTICIPATION ON PROGRAM PERFORMANCE

During the 1983 target area selection process, citizens had the opportunity to participate in several ways. The formal participatory mechanisms were city-wide meetings and hearings held by the Development Department, CD Task Force, and City Council. The Development Department also held an April Saturday workshop for Columbus residents who wished to voice their neighborhood needs to bureaucratic decision makers. But overall attendance at these meetings by individual Columbus residents was sparse. The bulk of the audience was comprised of area commission members, interest group members, and community activists, who according to several long time observers, continually attended CDBG hearings year after year. A number of implementation actors offered explanations for the low citizen turnout at the citywide meetings:

It is hard to get citizens to come out and participate. It seems there must be an advocacy type thing—group and organization participation. Citizen participation hasn't had that much of an impact. It is really symbolic.

Low and moderate income citizens need a lot of motivation to get involved in civic affairs because they lack money and an education. This is a complex program that requires sophistication to deal with. Its workings are not visible to the community. There is very bad participation by Columbus neighborhoods.
As these comments indicate, motivating citizens to attend community meetings outside of their neighborhoods has been difficult to accomplish in Columbus. Problems of time, money, and lack of education have worked to thwart the participation of low and moderate income residents.

Community and interest group participation was a second avenue of participation open to Columbus citizens. Community activists were visible at city meetings throughout the 1983 grant application process. At one April Development Department meeting, ACORN organized some twenty-five low income citizens to attend. These citizens wanted CDBG dollars for home rehabilitation and ACORN served as a valuable mobilizing citizen participation mechanism. Community and interest group members also represented the concerns of Columbus residents before the City Council and lobbied Development bureaucrats apart from the city wide forums. Citizens who attended city council meetings late in the grant application process had little visible effect on the city council's final recommendations. Although Columbus city council members have the final say over the grant application submitted to HUD, they made few substantive changes in the Development Department and Task Force recommendations. The 1983 grant application process revealed that citizens who wished to participate in the grant formulation process were more likely to affect programmatic
decisions during the first two months of community hearings. In a climate of limited conflict between Development Department bureaucrats and Task Force members, the city council was more likely to accept their recommendations rather than make substantial alterations in the face of community group lobbying efforts.

Beside attending city-wide meetings, Columbus citizens could contact their Community Development Task Force representative. If their neighborhood was not represented on the CD Task Force, citizens could still attend the city-wide hearings and express their views. These citizens also had the opportunity to contact City Council members and Development Department officials.

Interviews with implementation actors and citizens and observations at community meetings revealed that group participation was the most effective form of participation in affecting who governs the CDBG program, how the funds are used, and who benefits from the implementation process.

Who Governs?

As discussed in chapter three, the Community Development Task Force is the formal participatory mechanism for affecting who governs the Columbus CDBG program. Since its creation in 1978 the CD Task Force has performed a number of functions. These include: reviewing and commenting on the writing of the Community Development plan and applica-
tion, monitoring and evaluating program implementation, and disseminating the results of Task Force discussions and community meetings to neighborhood groups and organizations. The CD Task Force held seven open meetings during the 1983 grant application process to fulfill these functions. As an advisory body, the CD Task Force offers input regarding which areas are chosen as target areas and which programs should receive CDBG funding. Several implementation actors commented that the CD Task Force has played an important advisory role when communicating specific neighborhood needs to Development Department officials and city council members and acts as a "watchdog" over the grant application process. One long time Task Force member argued that the Task Force serves an important check on the Development Department and City Council:

Numerous proposals seeking CDBG funds were not funded as a result of Task Force recommendations. The Task Force is a check on the process. It looks over the shoulder of other participants and acts as a watchdog.

A Development Department bureaucrat emphasized the important communication role performed by the CD Task Force:

Citizen participation has had a very significant impact. The squeaky wheel gets the oil. We feel we work closely with neighborhoods through the Task Force. Public hearings and discussions let citizens speak out about their neighborhoods. Over a period of time, citizens will have their concerns represented. If not this year, perhaps their comments will be reflected next year. The CD Task Force is a good vehicle for communication and exchange of information with DOD.
Other local implementation actors also said that the Task Force has provided decision makers with valuable neighborhood information in its advisory role. But interviews with bureaucrats, city council members, community activists, and CD Task Force members, and observations at community meetings revealed several serious Task Force weaknesses.

A central obstacle to informed Task Force participation has been the problem of technical program information. As one community activist pointed out, the CDBG program "is not easily understood" and the Task Force does not receive comprehensible information regarding potential target areas in a timely manner. During the 1983 grant formulation process, CD Task Force members received stacks of Development Department technical information at the meetings where important decisions were to be made. Task Force members rarely had the opportunity to digest the information prior to voting on important grant distribution questions. When asked "what are the weaknesses of the CDBG Task Force?," Task Force members identified the information problem:

We don't get all the information from the Department of Development we need to deal with a program.

The lack of any meaningful preparation before meetings. We have a lack of information.

The Task Force needs more information about programs. There needs to be more advanced planning, analysis, and statistical information made available to the Task Force.
A second key Task Force weakness not unrelated to the information problem has been poor member attendance at weekly meetings. During the 1983 grant formulation process, thirteen Task Force members, on the average, attended seven Task Force program meetings. From meeting to meeting, there were often many different Task Force members in attendance. Due to the lack of continuity, it is not surprising that proceedings often moved at a snail's pace as problems solved the previous week were raised by Task Force members who were not in attendance. One community activist, who has attended numerous Task Force meetings through the years, was particularly frustrated by the 1983 grant application process:

The Task Force does not have the necessary information they need. But Task Force members don't do their homework anyway and attendance problems hurt the committee. One-half of the meetings were as though nothing had been done at previous meetings because members had not been there previously. A lot of time was wasted discussing issues solved the previous week.

Several Task Force members identified reasons for the poor attendance and the lack of meeting preparation. The CD Task Force is a voluntary organization and its members have other full time occupations. For most Task Force members, mere attendance at a weekly four hour meeting posed time constraints. In addition, Task Force members, unlike Development Department staff and City Council members, do not have the staff needed to provide them with relevant
technical information. As a result, the Task Force must rely on the Development Department for technical information regarding potential CDBG target areas. Two CD Task Force members outlined these problems:

The Task Force has no staff of its own. We have been snowed by the staff because we don't have the facts and figures we need. The CD Task Force is a reactive body. We rely on the Department of Development for the facts and this information is from people often trying to manipulate us.

We don't have the influence we should have for three reasons. We are appointed to that group. It is a voluntary organization. People who serve on the Task Force are volunteers and they have limitations on the time and energy regarding investigation. The Department of Development does not share the amount of information it might share in order to get full citizen participation. Because of time problems, members of the Task Force would not read the information anyway. Finally, the Department of Development does not give weight to certain ideas. The Task Force is just one small voice to be listened to among many.

Numerous implementors also identified structural Task Force weaknesses. Several pointed out that there is no provision for removal of the committee chairperson. As it stands, the committee chair has been appointed for life. Others suggested that the committee suffers from unequal representation that is the result of poorly designed selection procedures. As chapter three indicates, CD Task Force members are selected by the Development Department and approved by remaining Task Force representatives. Those areas that have received substantial CDBG funding in the past (i.e.
target areas and revitalization/stabilization areas) are represented on the CD Task Force. Communities with area commissions are also entitled to representation. Areas that have not received substantial CDBG funding in the past, that do not have an area commission, and who wish to be identified as target areas, must persuade current CD Task Force representatives to consider their community's concerns. But as numerous implementation actors pointed out, the CD Task Force is an unlikely forum for affecting who governs the CDBG program and the distribution of program benefits because the representation selection process encourages self interest. Two community members who were actively involved during the 1983 grant formulation process identified the consequences of this problem:

There is not a sufficient turnaround on the Task Force regarding how the money can be spent. There is no mechanism for changing the leader of the Task Force. We must have wider participation. Those making the decisions keep on getting the money. The CD Task Force is the biggest stumbling block there is.

Citizens on the Task Force cannot have a meaningful impact. They are fiercely protective of keeping money in their own neighborhoods. They are tied into the staff. They tend to be totally different from the people in their neighborhoods.

Two city council aides also attacked CD Task membership:

The primary problem is that the Task Force is made up of citizens who receive a CD supplement. There are hints of favoritism. The citizens on the Task Force who are most active get money. Sometimes the Task Force feels that their word is the last word. We ask for their input and recommendations, but city council has the last word.
There needs to be a structured, professional citizen participation with committees and terms of office.

The Task Force has become protective of its own turf—the same people protect their own turf and interests. This is always the problem with district representation. If you go against the Task Force, then you are against the community. It has become locked in and is a bureaucracy in and of itself.

To many Development Department bureaucrats, the Task Force is comprised of self-interested "elite citizens." When asked, "are there problems in implementing citizen participation in Columbus," a senior Development Department official offered a typical response:

There are problems because there are professional citizens. The professional citizens' point of view is always heard. Others who really need CD don't have a say.

Not surprisingly, few Task Force members criticized committee representation. But one outspoken Target area representative offered a serious indictment of the Task Force:

Everyone is greedy on the Task Force. There should be an emphasis on the community. Everyone wants funds for their area.

When asked to compare Task Force meetings this year to previous years a Task Force member offered this criticism:

I don't see that great a change. The average citizen still doesn't feel free to attend the hearings. There are many informal cues present including various messages of power. Certain Task Force members always have briefcases. Also, there are differences in the chairs between Task Force members and other citizens.
As these comments indicate, the CD Task Force has been viewed unfavorably by numerous implementation actors. Operating under time, staff, and information resource constraints, the Task Force must respond to the Development Department's recommendations. As a reactive, advisory body, the Task Force had the opportunity to offer input into the 1983 grant formulation process, but did not alter significantly the Development Department's budgetary and target area recommendations. Plagued by poor attendance and biased representation, the CD Task Force is largely a conservative group of "professional citizens" lobbying for their own neighborhoods. As table three in chapter four indicates, local implementation actors perceived that the CD Task Force had the least amount of input into the grant decision making process when compared to Development Department officials and City Council members. Interviews with long time implementation actors suggested that Task Force input into the grant formulation process has been on the decline. Table 6 confirms that community group members perceived that the Task Force had little meaningful input into the grant decision making process. When asked to "describe the process you went through in your attempt to have this proposal included in the CD grant application," and "what people did your group approach," community group members identified the CD Task Force third behind the
Department of Development and City Council. While Columbus has clearly exceeded the statutory requirements for citizen participation, the formal participation mechanism has suffered from overall ineffectiveness. At times the Community Development Task Force has served as a public watchdog over Development Department CDBG decisions. But as reflected during the 1983 grant formulation process, the CD Task Force has been a weak vehicle for channeling the needs of all Columbus neighborhoods into the CDBG governing and decision making process.

Table 6

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<th>Community Group Member Contacts of CDBG Grant Decision Makers</th>
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<td>Decision Makers</td>
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<td>Community Group Members</td>
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The figures represent the total number of times each decision making group was selected by community group members in response to the following questions: "Describe the process you went through in your attempt to have this proposal included in the CD grant application," and "What people did your group approach?" Response categories were not specified and multiple responses were recorded.

DOD=Columbus Department of Development
CC=Columbus City Council
CDTF=Community Development Task Force
DK=Don't Know
How are the Funds Distributed?

Interviews with local implementation actors, observations at community meetings, and examinations of City Council budgetary and target area recommendations revealed that community group participation was the most effective form of participation for citizens interested in securing program benefits for their neighborhoods. When asked to assess what factors affected target area selection during the 1983 formulation process, several community group members stressed the importance of group participation:

The target areas are very political choices. There is an awareness on the part of DOD that there are vocal groups. They are diffused and are given target money. Divide and conquer is the approach.

Political. The group that does the most lobbying will get money for their neighborhood. Fifteen areas are all eligible. Whoever yells the loudest will be a target area.

Target area selection is always a blend of DOD's opinion and the political clout of each neighborhood with city council. City council wants to scatter the money around to appease as many people as they can. They have their own pet projects. If we weren't organized in 1978, we would never have been a target area.

A city council member confirmed these observations regarding the impact of group participation on the selection of target areas:

Sometimes it gets political. Everyone develops a base over a period of time. The group that screams the loudest will get money.
When asked to assess the impact of citizen participation on the implementation of the CDBG program and distribution of program benefits, numerous Development Department officials confirmed that group organization and participation is most important. One bureaucrat offered a typical response:

I don’t know if the same neighborhoods would have gotten money without it. The real active neighborhoods, those that lobby city council get the most money. Those that have no neighborhood organization don’t.

Bureaucrats and city council members also confirmed that the four original target areas and the fifth addition had well organized community organizations that conducted intensive lobbying efforts. Godman Guild (the most vocal group representing Harrison West) and Southside United Neighbors (representing Southside One) were more openly vocal in their funding demands than Milo Grogan, Bellows, and Atcheson East. Interviews with local implementation actors and observations at community meetings indicated that Milo Grogan and Bellows did not need to conduct vocal public lobbying efforts, as these groups were promised target area recognition early in the grant formulation process. Atcheson East, a late addition to the target area list, lobbied city council members privately and persuaded the council to grant the neighborhood target area status. Harrison West had been a revitalization/stabilization area since 1978, and was promised target area recognition during
1983. Despite this promise, Godman Guild representatives were vocal participants at community meetings and lobbied Development Department spokesmen privately. Southside One was ably represented by the conflict oriented Southside United Neighbors community group and this organization lobbied Development Department bureaucrats and city council members both privately and at community meetings.

The CD Task Force had little impact on the selection of the 1983 target areas. Structural biases built into the Task Force worked to thwart meaningful and effective citizen participation. Bellows, Harrison West, and Milo Grogan all had representatives on the 1983 Task Force, but the evidence suggests that these individuals had little effect on the selection of their neighborhoods as target areas. The Harrison West and Milo Grogan representatives rarely attended the community meetings. The Bellows area representative attended virtually all community meetings, but knew that his area had been promised target area status prior to any community meetings. Southside One and Atche-son East were not represented on the 1983 CD Task Force and Southside One's new status as a target area offers support to the conclusion that Southside United Neighbors active participation prior to and during the grant formulation process affected the distribution of program benefits. Implementation actors attacked the formal citizen partici-
pation process. To most observers, Task Force participation had little effect on the distribution of program benefits. Frustrated Task Force members said:

We are not involved in the choosing of target areas. That is a Department of Development decision. They want us to be involved symbolically, but not really truly involved. We are a rubber stamp.

The staff makes out the ninth year program and we only modify one or two items. The Task Force is being used as we make only cosmetic changes. We have no real input in the selection of target areas.

At times in the past, we have played a major role, but this year we are being used by the DOD. The Department feeds only certain projects to us and says that we must approve them tonite. Many projects DOD gets are not even brought to us for consideration.

To many observers, the 1983 formal citizen participation process was considerably less effective in affecting the distribution of program benefits when compared to previous years. Some respondents questioned the sincerity of Columbus' citizen participation efforts. When asked "if there was no citizen participation, would the outcome have been any different?" several community activists responded cynically:

No. The Development Department came to the meetings with predetermined ideas of where they were going to put the money. Citizen participation made no difference.

I doubt it. Citizen participation was included in this program for window dressing. It is symbolic. The framework for decisions has always been set by the time citizen influence comes in.
No. The Development Department staff makes up their minds in February where to spend the money and they don't change them. Citizen participation is not taken seriously.

Not surprisingly, most Development Department bureaucrats argued that the Task Force has affected the distribution of CDBG benefits. But two officials offered a negative view of Task Force participation:

This year the Task Force has not had a major impact. Citizens have an impact regarding everything on a list that is presented by the administration. There is no impact on the formulation of activities.

Citizens have raised issues for consideration but the Task Force has had little effect on the distribution of grants. The Task Force has been predominantly an oversight committee. They are not involved in major policy decisions. These decisions have been made a long time ago.

One bureaucrat admitted that the Task Force has had little impact on broad grant decisions, but argued that neighborhood citizen participation has affected the distribution of grants in chosen target areas:

Citizen participation doesn't have much effect on the overall allocation of large sums of money, but it does have an effect on distributing money in target area communities.

Other bureaucrats praised the Columbus citizen participation process and argued that the Task Force has affected the distribution of program benefits:

Generally, citizen participation has developed into a cooperative working together on both sides. Citizen participation insures that the Department of Development doesn't get off on its own kick to the detriment of the community.
Citizen participation through the Task Force always plays a very important role in the distribution of grants. Citizens that raise concerns will often get resources for their neighborhoods. The final decision is made by council who responds to constituents. In the CDBG program we have tried to ascertain the needs and desires of citizens.

Citizen participation is good because it forces us to accelerate our performance. An ordinance that goes to council that is approved by the Task Force will likely get approved by council. We have pretty responsible citizen participation here. Citizen participation is a pressure to keep things honest and proper. It needs to be a functional part of the process because citizens need to have control.

Interviews with other implementation actors, observations at community meetings, and examinations of the budgetary recommendations do not support the conclusion that the CD Task Force had a significant impact on the selection of target areas and the distribution of program benefits. Community activists, CD Task Force members, and City Council aides claimed that four of the five target areas were selected independently of Task Force recommendations, as they were chosen prior to the community discussions regarding the ninth year budget. The five target areas were well organized politically, as active community groups lobbied Development Department bureaucrats and City Council members. The strong community group lobbying efforts in each of the five target areas support the conclusion that group lobbying efforts have been more important for securing program benefits in the absence of "meaningful" Task Force and
individual citizen participation. An examination of the line by line, week by week budgetary recommendations reveals that the CD Task Force had a limited impact on budgetary allocations as only several substantive changes occurred in the Development Department's original budgetary program allocations. The City Council did not alter these recommendations significantly, except for the addition of the Atcheson East target area. Interviews revealed that DOD and the Task Force did not challenge this addition. The entire 1983 grant formulation process was characterized by little open conflict between the Development Department, City Council, and CD Task Force. Neighborhoods represented on the Task Force were more likely to be considered as potential target areas. But for Columbus citizens and neighborhoods seeking to acquire CDBG funds in a time of increased resource scarcity, conflict was the norm as they competed for limited program benefits.

Who Benefits?

As detailed in chapter four, the question of who has benefitted from the Columbus CDBG process has engendered conflict between citizens and Development Department bureaucrats and city council members through the years. Conflict over the perceived lack of low and moderate income benefits characterized the 1983 grant formulation process. Community meetings offered community group representatives
the opportunity to voice their concerns to Development Department bureaucrats, city council members, and CD Task Force members over who should benefit from the Columbus CDBG implementation process.

Throughout the grant formulation process, bureaucrats encouraged the numerous community representatives and the few citizens in attendance to express their concerns to the Development Department. When asked by a community representative how a neighborhood can become a target area, a high ranking Development Department spokesman responded at a March community meeting:

By mentioning it tonite, calling us on the telephone, by contacting the Development Department.243

But one frustrated community activist pointed out that his attending numerous community meetings and contacting Development Department officials had little effect on their responding to the displacement issue. When asked to "describe the process you went through in your attempt to have this proposal included in the CD grant application," he responded:

I wanted adequate reallocation assistance for displacement. I lobbied Development Department staff and then went to the Task Force. They seemed to blow it off. At the community meetings they said they'd include my concerns in the application but in the end they didn't allocate money for displacement. They were totally insensitive.

243 Community Meeting, Columbus, Ohio, March 16, 1983.
A second community activist described her futile effort to have her concerns reflected in the grant application:

"I talked to all of the important DOD officials and attended the community meetings. It took me about two months to get an application that would allow me to apply for funds. DOD gave me a lot of lip service. I wasted a lot of my time and they did what they wanted to do anyway."

Unfortunately for these community activists, they did not have a strong, visible community organization to support their lobbying efforts. But another community activist whose organization represents low income citizens, was more successful in securing program benefits. She outlined her organization's successful strategy:

"Effective citizen participation means showing up with forty people at the Development Department and chanting for the director. We didn't leave until he spoke to us and guaranteed that our needs would be met."

A fourth community activist argued that group participation has been effective:

"Citizen participation has had a significant impact on who benefits. Vocal and organized groups have the most say. Organizations participating can have a significant impact."

These community activists have been successful in influencing decision making because they recognized that vocal community group participation was effective in affecting who governs. Interviews and observations revealed that well organized, vocal community groups have the most potential for affecting who benefits. One bureaucrat offered a possible explanation for this finding:
The director and his aides like to avoid controversy as much as possible. In the face of vocal and well organized community group participation, Development Department officials, who tried to minimize controversy throughout the 1983 grant application process, responded to many of these group's concerns.

As reflected in the 1983 grant formulation process, the CD Task Force is an ineffective vehicle for low and moderate income citizens desiring CDBG program benefits, because of its membership and selection procedures. As one senior Development Department official said:

The problem with the Task Force is that areas that are not receiving money will never receive it.

The Task Force is comprised largely of self serving representatives who wish to secure program benefits for their areas. In addition, the Task Force rarely alters Development Department recommendations and as a result, performs the more conservative legitimizing function. When asked, "what is the role of the Community Development Task Force and what role should it have?" one Task Force member responded:

Ideally, it is to serve as the representative body for citizen input from areas being served by CDBG grants. Functionally, we are the political justification and legitimation for unpopular DOD and city council decisions. Nobody who is elected likes to take the rap for an unpopular decision. If we make recommendations they don't like, they ignore us. If they like our recommendations they talk to us.
As an advisory, reactive body the CD Task Force offers only input into the grant formulation process. For areas with membership on the CD Task Force, representatives can play a valuable role in communicating the needs of their respective communities. But for low income neighborhoods and citizens who are not represented on the Task Force, the formal Columbus citizen participation mechanism is of little value. The 1983 Columbus implementation experience reveals that in the absence of clear legislative standards regarding the distribution of program benefits, and hostility on the part of key program implementors towards citizen participation, disenfranchised low income citizens must join well organized community groups if they want their needs considered in a time of decreased program resources. The consequences of these citizen participation findings for policy implementation and democratic theory are examined in chapter six.

CONCLUSIONS

1. The 1983 Columbus grant formulation process was characterized by local implementor confusion and conflict over the precise role of citizen participation in the absence of clear policy standards.

2. Despite the Reagan administration's elimination of statutory requirements for citizen participation,
Columbus has not reduced its citizen participation requirements. But community and interest group members, unlike Development Department and HUD bureaucrats and city council members, perceived that the quality of low and moderate income citizen participation was reduced considerably in 1983.

3. Since the Reagan program reforms, the Columbus HUD office has played a limited citizen participation oversight role.

4. While city council, CD Task Force, and community group members have been strongly supportive of citizen participation, Development Department bureaucrats are less supportive of citizen input into the CDBG application process.

5. Community and interest group members, and many citizens attending target area community meetings perceived that the Development Department was not interested in obtaining citizen input. These perceptions led to increased conflict between citizens and Development Department bureaucrats over the role of the citizenry in the CDBG grant application process.

6. Many citizens who attended community meetings in the Harrison West, Bellows, and Southside One target areas believed that the meetings played a valuable education function. To these citizens, the meetings provided
CDBG program information and knowledge regarding other citizen's needs.

7. Community group, city council, Development Department, and Task Force members perceived the CD Task Force as a weak citizen participation mechanism. The Task Force has served as a watchdog over the grant application process, and as a communication channel for those neighborhoods it represents, but it suffers from poor attendance at weekly meetings, a lack of information, money, and staff resources, and representation which promotes only the self interest of areas from which members come. As a reactive, advisory body, the Task Force legitimated Development Department programmatic decisions and offered little input into the 1983 target area selection process.

8. Community group participation was the most effective form of participation in affecting who governs, how the funds are used, and who benefits from the 1983 CDBG implementation process.

9. Limited conflict between Task Force, City Council, and Development Department members characterized the 1983 grant application process. But for low and moderate income citizens and neighborhoods seeking to acquire CDBG funds in a time of increased resource scarcity, conflict with implementation actors at community meet-
ings was the norm, as they competed for limited program benefits.
Chapter VI
CITIZEN PARTICIPATION AND BUREAUCRATIC ACCOUNTABILITY

This empirical study of the 1983 Columbus CDBG implementation process reveals that the Reagan reforms have led to increased local bureaucratic discretionary decisionmaking in an environment of resource scarcity. As the formal Columbus citizen participation mechanism, the CD Task Force has been an ineffective vehicle for low and moderate income citizens who wish to affect bureaucratic and city council decisions. Instead, community group participation was the most effective form of participation in affecting who governed, how the funds were used, and who benefitted from the 1983 CDBG implementation process.

As the urban politics literature suggests, two key problems confronting American cities include the fragmentation of policy and service delivery and the lack of meaningful citizen participation. In a time of increased resource scarcity, the block grant approach fosters a zero-sum environment where there are clear winners and losers in the distribution of program benefits.\textsuperscript{242} The problems of frag-

\textsuperscript{242} See Lester Thurow, \textit{The Zero Sum Society} (New York: - 205 -
mentation, weak citizen participation, resource scarcity, and the reliance on the block grant have increased the autonomy of local bureaucrats and heightened conflict between citizens, elected officials, and bureaucrats.

This chapter examines the implications of the implementation findings for urban politics and policy implementation and assesses the crucial role played by the bureaucracy in a democratic society. The implications of the citizen participation findings for holding bureaucrats accountable to the citizenry are considered in light of the Columbus implementation process and are placed within the broad context of democratic theory. It is argued that citizen participation is the link between bureaucratic accountability and democracy. The components of a meaningful and effective citizen participation mechanism are identified and several conclusions are offered regarding the Columbus citizen participation process. First, in an environment of bureaucratic hostility towards citizen participation, conflict oriented participation between community action groups and decision makers was the most viable form of citizen participation for disenfranchised citizens in the 1983 grant application process. This conflict often took the form of "street fighting pluralism." Second, several practical problems impeded meaningful and effective Task Force participation. These included: (1) the lack of Penguin, 1980).
meaningful and timely program information; 2) the absence of technical expertise; 3) poor Task Force attendance; and 4) inadequate representation. Finally, the 1983 formal Columbus citizen participation process supports the argument that citizen participation may be merely symbolic participation. It is possible to have a formal citizen participation mechanism without having meaningful and effective citizen participation.

These arguments are developed further when the following questions are addressed:

1. Can bureaucrats be held accountable in a democratic society? If so, how?

2. What do the Columbus citizen participation findings suggest regarding achieving effective citizen participation? What are the implementation barriers to achieving meaningful citizen participation?

3. What are the advantages and disadvantages of increased citizen participation in urban service delivery decision making?

4. What are the implications of the Columbus findings for policy implementation, urban politics, and democratic theory?
FUNCTIONAL BUREAUCRATIC FIEFDOMS: THE NEW URBAN MACHINES

A significant portion of the urban politics literature is devoted to describing the consequences of political machines for American urban inhabitants in the early 1900's. But as Douglas Yates suggests, the machine politics of the early 1900's have had a profound impact on the overall "nature and structure of city government" today. The dual migration of poor, rural, and racial minority groups into large central cities, and the movement of affluent, middle-class whites out to the suburbs has changed the metropolitan political structure. Four basic changes in machine politics since the early 1900's include a decline in urban party politics, the changing role of political patronage, the diminished role of the machine as a channel of social mobility, and the establishment of new bureaucratic organizations to meet many of the needs that the political machines once handled. Ultimately, the urban reformers hoped that the city would be


245 Harrigan, p. 39.

246 Harrigan, pp. 95-97.
administered competently "on a politically neutral basis."²⁴⁷ Although the reform movements prospered more in certain kinds of cities than in others, their overall effect has been to weaken the machines. Yet as Harrigan admits, "the reforms have led to an increased rather than a diminished fragmentation in city government."²⁴⁸ This increased fragmentation has fostered the reactive urban policy making and implementation process that both Yates and Theodore Loui lament.²⁴⁹

Several urban scholars argue that the reform of the old machines led to the creation of new machines which are functional rather than geographic in their scope. As Loui suggests, the destruction of the machine did not "elevate the city into some sort of political heaven."²⁵⁰ Instead, the reforms merely altered what one had to do to obtain political power. With the demise of the old machine, urban residents now turned to specific bureaucratic fiefdoms for the city services once controlled by the machine boss. Yates identifies this new urban system as "a service deliv-

²⁴⁷ Harrigan, p. 107.
²⁴⁸ Harrigan, p. 120.
ery system" which is characterized by personal service, variation in community needs, and the establishment of urban political organizations to insure that the concerns of all urban residents are being considered. Although Yates recognizes that this new urban system is successful in providing specialized services to city residents, he contends that "the structural patterns that characterize this new urban system play a central role in the increased fragmentation, instability, and reactivism of urban policy-making and thus contribute to making the city increasingly ungovernable."251 Others argue that this new form of machine politics is biased against the poor, minorities, and citizen input, and favors the business establishment which benefits from "private decisions cast in concrete."252 Numerous urban scholars cite the autonomous power of municipal bureaucracies within central cities as contributing to the ineffectiveness of urban governance. These islands of functional autonomy have fostered increased fragmentation and impeded the citizenry's chances to affect policy decisions.253 The next section addresses the role of the bureaucracy in a democratic society and lays the groundwork for a discussion of citizen participation in the Columbus CDBG implementation process.

251 Yates, p. 83.
252 See Judd and Harrigan.
253 David and Peterson, p. 9.
THE ROLE OF BUREAUCRACY IN DEMOCRATIC SOCIETY

This section offers three contemporary views of the role of bureaucracy in a democratic society. The arguments of Ralph Hummel, Douglas Yates, and Michael Lipsky are explicated, and serve as the broad context for the discussion of citizen participation as the link between bureaucracy and democracy.

In Economy and Society Max Weber raises the issue of whether the technical superiority of modern bureaucracy is compatible with democratic principles. Weber identifies two key questions that must be confronted in the face of the irresistible advance of bureaucracy:

1) How can one possibly save any remnants of individualist freedom in any sense? 2) How will democracy even in this limited sense be at all possible? 254

The tension between democratic principles and bureaucratic efficiency is also examined in more recent works on the bureaucracy. Ralph Hummel offers a Weberian indictment of modern bureaucracy and argues that "public bureaucracies are control institutions" because they threaten individual freedom. Hummel's central concern is the loss of meaningful citizen input which accompanies increased bureaucratic decisionmaking. To Hummel, this 'hidden decision-


making" is apolitics because it "decides the fate of the public but excludes the public from the process." He argues that bureaucratic functionaries practice "politics as usual" without the citizen input that is needed to hold bureaucrats accountable in a democratic society.256

Hummel's analysis is disappointing because he offers no concrete solutions or proposals for controlling the bureaucracy. Instead, he attacks modern bureaucracy and implies that citizen participation is the central link between citizens and bureaucrats. But Hummel fails to identify the arena in which citizens should participate, what constitutes successful citizen participation, and how successful citizen participation might be achieved. The Columbus CDBG implementation process has revealed that these questions need to be addressed seriously.

In Bureaucratic Democracy Douglas Yates argues that the model of administrative efficiency that Weber and Hummel outline has "gained greatly in prominence at the expense of the model of pluralist democracy."257 Yates identifies six features that characterize the pluralist model:

- bureaucracy would 1) present multiple centers of power (by means of which concentrations of power would be checked), 2) facilitate the representation of interest groups by providing multiple points of access (especially to minority interests), 3) have strong elements of

256 Hummel, p. 165.

decentralization, 4) be internally competitive, 5) be open and participative, 6) produce widespread bargaining. 258

Yates argues that because bureaucracies possess special professional resources, such as technical expertise, they have an advantage over citizens in the policy implementation process. Unlike elected officials, bureaucrats are not controlled democratically by citizens. 259 These distinct bureaucratic advantages can be overcome in a competitive environment of citizen participation which will force the bureaucracy to adhere to the principles of pluralist democracy. 260

Yates' analysis is insightful because he offers a concrete model for evaluating bureaucratic decisionmaking. This pluralist model will be used to evaluate critically the role of the Columbus Department of Development in the CDBG implementation process. Yet Yates, like Hummel, fails to address important citizen participation issues: what is the arena in which citizens should participate, what constitutes successful citizen participation, and how might successful citizen participation be achieved? To the extent that these hard empirical questions remain unanswered, citizen participation as the means for achieving bureaucratic accountability will be difficult to achieve.

259 Yates, p. 114.
260 Yates, p. 113.
The desirability of holding bureaucrats accountable to the citizenry through citizen participation is reinforced by Michael Lipsky's work *Street Level Bureaucracy*. Lipsky identifies street level bureaucrats as "public service workers who interact directly with citizens in the course of their jobs, and who have substantial discretion in the execution of their work."\(^{261}\) For Lipsky, street level bureaucrats play a vital role in urban service delivery because they provide the balance between public services and public expenditures.\(^{262}\) From the citizenry's vantage point, "street-level bureaucrats offer citizens the possibility of fair and effective treatment by local government."\(^{263}\) But he is not optimistic that this discretion can be eliminated for several reasons. Like Hummel and Yates, Lipsky identifies the monopoly of technical information regarding "the nature, amount, and quality of benefits and sanctions provided by their agencies."\(^{264}\) A second reason emanates from the relationship between street level bureaucrats and the citizenry:

Street-level discretion promotes workers' self-regard and encourages clients to believe that workers hold the key to their well-being.\(^{265}\)

\(^{261}\) Lipsky, p. 3.

\(^{262}\) Lipsky, p. 12.

\(^{263}\) Lipsky, p. 12.

\(^{264}\) Lipsky, p. 13.

\(^{265}\) Lipsky, p. 15.
It is here that Lipsky recognizes a need for accountability to link bureaucracy and democracy:

Modern democracy depends on the accountability of bureaucracies to carry out declared policy and otherwise administer the ongoing structures of governmentally determined opportunity and regulation.\(^{266}\)

He concludes that street-level bureaucrats have the most influence on policy implementation,\(^{267}\) and client control through citizen participation may lead to increased bureaucratic accountability. Yet Lipsky is aware that large-scale social changes or modifications in the organization of public services must first occur before meaningful and effective citizen participation is achieved.\(^{268}\)

Lipsky's analysis is insightful because he recognizes structural features of the policy implementation process that afford street level bureaucrats widespread discretion in the delivery of program benefits. Unlike Hummel and Yates, Lipsky questions the feasibility of achieving meaningful citizen participation to bridge the gap between bureaucratic accountability and democracy. In doing so, he moves a step closer to confronting the key practical citizen participation questions that Hummel and Yates ignore.

\(^{266}\) Lipsky, p. 160.

\(^{267}\) Lipsky, p. 207.

\(^{268}\) Lipsky, p. 196.
The second half of this chapter is devoted to addressing these empirical citizen participation questions in light of the Columbus CDBG implementation process. But before discussing the implications of the Columbus citizen participation findings for democratic theory, policy implementation, and urban politics, it is necessary to place the arguments for and against increased citizen participation within the broad context of democratic theory.

**Participation, Representation, and Democratic Theory**

The problem of defining what is meant by meaningful and effective citizen participation pervades much of the participatory democracy literature. But a thorough examination of participatory democratic arguments reveals that three elements must be present if meaningful and effective citizen participation is to be achieved: 1) a sense of community identity, 2) education and the development of citizenship, and 3) self determination by those participating.

Proponents of participatory democracy argue that increased citizen participation in community decisionmaking is important if the citizenry is to recognize their roles and responsibilities as citizens within the larger community. Community meetings, it is argued, afford citizens knowledge regarding other citizen’s needs. In a true participatory setting, citizens do not merely act as autono-
ous individuals pursuing their own interests, but instead through a process of discussion, debate, and compromise, they ultimately link their concerns with the needs of the community.

The arguments for participatory democracy are based upon two additional tenets—1) a belief that increased citizen participation will contribute both to the development of the individual and the individual's realization of citizenhood; 2) and a belief that individuals should participate in community and workplace decisions that will affect the quality and direction of their lives. Each of these tenets are grounded in a "positive" conception of liberty:

The positive sense of the word liberty derives from the wish on the part of the individual to be his own master. I wish above all, to be conscious of myself as a thinking, willing, active being, bearing responsibility for my choices and able to explain them by references to my own ideas and purposes. I feel free to the degree that I believe this to be true, and enslaved to the degree that I am made to realize that it is not.269

Proponents of participatory democracy argue that citizen participation in decision making has a favorable psychological effect on those participating. Due to participation in political decision making, the individual "learns to be a public as well as a private citizen."270 While Rousseau


stresses the importance of participation for its positive psychological and educative impact upon the individual. John Stuart Mill extends these notions even further. To Mill, participation in community decision making will allow individuals to develop their powers or capacities to their fullest potential and "the good society is one which permits and encourages everyone to act as exertor, developer, and enjoyer of the exertion and development, of his or her own capacities." The key here is for individuals to perceive themselves as developing their own capacities through participation in decision making. As Macpherson points out, this is important for the emergence and the continued success of a participatory democracy.

Besides developing the individual's creative capacities, participation in decision making forces the individual to become more informed regarding the political process. Citizen participation theorists such as Robert Pranger emphasize the beneficial learning process that is afforded to all those citizens who participate in community decision making. Pranger contends that citizens currently "learn about government and values relating to politics, rather than practicing government." For Pranger, the political

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272 Macpherson, p. 99.

273 Robert J. Pranger, The Eclipse of Citizenhood: Power and Participation in Contemporary Politics (New York:
education of the individual, rather than socialization will be practiced wherever increased citizen participation is encouraged:

Participation encourages one form of cultural communication, political education, whereas power encourages another form, political socialization. So obviously where power dominates political culture, as it does most often today, socialization will be the prevailing method of communication from culture to citizen, but not the only method. Political education will appear wherever free citizen participation occurs within the power culture.  

As citizens become more educated regarding the importance of political participation in the community, they will develop a heightened degree of political efficacy, "a person's sense of his capacity to effectively manipulate his environment through political participation." With increased political participation and heightened efficacy, the citizen will be able to overcome the alienating consequences of modern bureaucracy and the alienating consequences of mass-industrialized society. If the citizenry is to overcome the alienating conditions of modern bureaucracy, there must be increased citizen participation as Cook and Morgan suggest:

In an age of bigness and bureaucratization, people experience a feeling of helplessness, of being administered in the complexity of a


Pranger, pp. 46-47.

Terrence Cook and Patrick M. Morgan, eds., Participatory Democracy (San Francisco: Canfield, 1971) p. 7.

275 Pranger, pp. 46-47.

275 Terrence Cook and Patrick M. Morgan, eds., Participatory Democracy (San Francisco: Canfield, 1971) p. 7.
Kafkasque world. Only a change in decision-making patterns can overcome this sense of powerlessness and the resultant apathy; for it is not by occasionally voting for authorities in the isolation of a curtained booth, but by actual engagement in making authoritative decisions that will serve to reinforce the average man's appreciation of his own political capabilities. 276

Through the discussion of public policy initiatives, citizens recognize what is in their own interest. As Dennis Thompson suggests, community discussion also helps citizens "see that their interests are partly identified with those of a larger community of which they are members. A spirit of the common life is supposed to emerge which is superior to the opinions of any particular individual because it is the product of diverse experiences and interests." 277 It is this principle that individuals should have the opportunity to develop fully their creative capacities through the exercise of citizenship, which is a key argument in the case for participatory democracy in the community and workplace.

A third component of the participatory democratic model is based upon the notion that individuals from all classes in society must share in those decisions determining the quality and direction of their lives. From this vantage point, important community decisions should not be made solely by bureaucrats and elected officials. If

276 Cook and Morgan, p. 7.

ple perspectives of those involved are to be consulted, the
group decision process is essential. Individuals who par-
ticipate in the local decision making process will be
afforded a sense of participation and commitment that is
otherwise non-existent in a system where elites rule the
policy making and implementation process. Besides permit-
ting individuals to realize self-development and practice
citizenship, participatory democracy ideally wrests the
policy implementation process away from the elite and
allows citizens to have a say in those decisions determin-
ing the quality and direction of their lives.

Critics of participatory democracy base their arguments
on three key beliefs: 1) the role expected of the citizen
in a participatory setting is unrealistic; 2) widespread
citizen participation in decision making is not feasible
given the constraints of a modern, technological society;
and 3) increased citizen participation replaces clear leg-
islative goals and fosters fragmentation throughout the
policy making and implementation process. As Bachrach sug-
gests, elite theorists attack the notion of individual
self-development through citizen participation because "to
continue to advocate such a theory in today's world is
bound to foster cynicism toward democracy as it becomes
evident that the gap between the reality and the ideal can-
not be closed." 278 Daniel Kramer agrees that participatory

278 Peter Bachrach, The Theory of Democratic Elitism
democracy is based on a utopian conception of human nature. He contends that most individuals will not be able to transcend their own private interests and consider the concerns of the larger community in a participatory setting. In his analysis of the failure of works councils and the War on Poverty, Kramer concludes that citizens "are more interested in their own advancement than in aiding their constituents."279

A second set of criticisms of the call for increased citizen participation emanates from the tenet that participatory democracy is too cumbersome and requires an inordinate time commitment on the part of those participating to occur on a widespread scale. Martin Oppenheimer challenges proponents of increased participation with this difficult question:

In a large-scale society, how much decentralization will be possible and necessary to promote real democracy? The concrete problem of where to draw the line has still to be faced.280


In her work *Beyond Adversary Democracy* Mansbridge answers Oppenheimer's question by concluding that democracies as large as the modern nation state must be primarily adversary in nature. To those calling for increased citizen participation in urban policy implementation, this is clearly a depressing conclusion. Yet Mansbridge also points out "that preserving unitary virtues requires a mixed polity--part adversary, part unitary--in which citizens understand their interests well enough to participate effectively in both forms at once." Although Mansbridge's empirical analyses of Selby and Helpline reveal that "face-to-face meetings of the whole encourage members to identify with one another and with the group as a whole in developing common interests," she concludes that "opening up the doors to participation in a direct, face-to-face democracy does not guarantee equal participation, let alone equal power." She finds that certain individuals--the educated, wealthy, and middle class--are more likely to participate in the town meetings because

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282 Mansbridge's conclusions are based on her empirical study of citizen participation in a New England town meeting (Selby, Vermont) and an urban crisis center (Helpline). For further details see her extended explanation in *Beyond Adversary Democracy*.

283 Mansbridge, pp. 4-5.

284 Mansbridge, p. 100.
they feel less inhibited to express their views than the uneducated. With its concentration on procedure or form rather than outcome, citizen participation might only serve to preserve the status quo. To be sure, the participation process does not insure equality of results. As Michael Smith suggests, citizen participation might only be a ritual that merely stabilizes and legitimates "the prevailing political and economic order."285

A third argument against citizen participation in urban decision making is expressed forcefully by Lowi in The End of Liberalism. Lowi laments the lack of goal clarity in federal legislation that accompanies the delegation of power and argues that the new bureaucratic fiefdoms are even more powerful than the old urban machines, because of the vague legislation they must implement at the local level. These functional feudalities garner much of their power as a result of the discretion they are afforded in implementing federal programs. Lowi rejects citizen participation as a solution for bureaucratic accountability because "the requirement of standards has been replaced by the requirement of participation" and this participation leads to increased fragmentation throughout the policy making and implementation process. Instead, Lowi calls for legisla-


286 Lowi, The End of Liberalism p. 56.
tion which issues "clear orders along with powers" to insure bureaucratic accountability.

In the absence of meaningful and effective citizen participation, the interests of urban residents may still be represented in the policy implementation process. Bureaucrats and local elected officials may have a genuine concern in emphasizing the redistributive elements of public policy and thus respond directly to the concerns of low and moderate income citizens. In addition, the clash of urban interest groups in an environment of "street fighting pluralism" may also serve to represent the concerns of the disadvantaged. Yet as conflict heightens between competing neighborhood groups over scarce resources, policy consensus is avoided and the policy implementation process is characterized by the increased fragmentation that both Yates and Lowi lament.

BUREAUCRATIC ACCOUNTABILITY AND CITIZEN PARTICIPATION IN COLUMBUS

The second half of this chapter evaluates the previous arguments critically, by examining bureaucratic accountability and citizen participation in the 1983 Columbus CDBG implementation process. The implications of these empirical findings for policy implementation, urban politics, and democratic theory are considered and the consequences of

287 Lowi, pp. 311-312.
these conclusions for implementing a block grant during a time of increased resource scarcity are discussed in light of the Columbus implementation process.

As table three in chapter four reveals, local implementation actors perceived that the Columbus Department of Development had the most input into the 1983 CDBG decision making process. In the absence of clearly communicated legislative goals and standards and limited oversight by HUD, street level Development Department bureaucrats have had the discretionary power to make the important decisions regarding the selection of target areas and the distribution of CDBG program benefits. They also possess the technical expertise, staff, and time that is needed to implement the Columbus CDBG program. In addition, the Columbus CDBG decision making structure fosters bureaucratic discretionary decision making. As detailed in chapter four, the CD Task Force and city council are both reactive bodies because they respond to Development Department recommendations. City council members have the final say over the grant application submitted to HUD, but they rarely make significant changes in Development Department recommendations unless a majority of Task Force members or a vocal citizen's group lobbies actively for a particular project. If we accept the argument that citizen participation is the link between bureaucratic accountability and democracy.
then the important empirical issue is how well the formal citizen participation process worked in holding Development Department bureaucrats accountable to the Columbus citizenry.

Yates argues that a central feature of the bureaucratic model of pluralist democracy is an organization's openness and responsiveness to participation. As table five in chapter four reveals, implementation actors held conflicting views regarding the perceived effectiveness of citizen participation in the 1983 grant application process. Community and interest group members perceived that citizen participation was considerably less effective than did Development Department bureaucrats, CD Task Force, city council, and Development Department bureaucrats. Open ended interviews with citizens attending community meetings also revealed objections to the formal citizen participation process.

As detailed in chapter five, the CD Task Force suffers from a number of structural weaknesses which hinder its overall effectiveness. While the Task Force has served as a watchdog over the grant application process and as a communication channel for those neighborhoods it represents, it suffers from poor attendance at weekly meetings, a lack of information, money, and staff resources, and inadequate representation, which promotes member self interest. Given
these numerous Task Force structural weaknesses, it is not surprising that it is viewed as a weak citizen participation mechanism. For those low and moderate income citizens whose neighborhoods are excluded from Task Force representation, their concerns are not formally reflected in the target area selection process. To these disenfranchised groups, the CD Task Force is comprised of selfish neighborhood representatives who wish to protect their own interests.

Interviews with implementation actors and observations at community meetings revealed that the CD Task Force is perceived as an ineffective citizen participation mechanism. Ronald Mason tackles the difficult empirical question of what comprises effective citizen participation. According to Mason, the quality and effectiveness of citizen participation are linked:

Effective participation is most clearly evident when the community members of the policy setting and decision makers are one and the same, although participation may be witnessed also in acts influencing decision makers and administrators of policy. It is never present, however, when political activity is nothing more than a technique employed by decision makers to co-opt the community members and legitimize the decision makers' preferences. Following Sidney Verba's lead, political activity unrelated to actual decision making will be termed "pseudoparticipation."²⁸⁸

Interviews revealed that numerous CD Task Force members perceived their participation to be merely "pseudoparticipation." To these individuals, because the CD Task Force is merely an advisory, reactive body it legitimates unpopular Development Department decisions. In the absence of the time, resources, and technical expertise that is needed to comprehend the intricacies of the CDBG program, CD Task Force members rarely substantially alter Development Department recommendations. The structure of the CDBG decision making process suggests that the CD Task Force will play a limited decision making role and the patterns of bias that characterize CDBG decision making work to thwart meaningful and effective Task Force participation. Numerous implementation actors pointed out that despite the Reagan administration's elimination of statutory requirements for citizen participation, Columbus had not reduced its citizen participation requirements. But while the Task Force provides an opportunity for citizen participation, it impedes meaningful participation by residents from various low and moderate income neighborhoods. For these citizens, community group participation was the most effective form of participation in affecting who governs, how the funds are used, and who benefits.

This vigorous community group participation contributed to a policy implementation environment characterized by
"street fighting pluralism." According to Yates, this is urban policymaking that is highly fragmented and conflictual:

Street-fighting pluralism suggests a political free-for-all, a pattern of unstructured, multilateral conflict in which many different combatants fight continuously with one another in a great number of permutations and combinations. This diversity of interests begins at the street level, between different people on the same block, between different blocks, between different groups in a neighborhood, and between different neighborhoods. It extends into conflicts between different city bureaucracies, between mayors and bureaucracy, and between city hall and independent boards and commissions.289

In an environment of increased resource scarcity, Columbus neighborhoods competed against each other for limited program benefits. Instead of unifying low and moderate income neighborhoods, the Columbus citizen participation process fragmented class interests and emphasized individual neighborhood concerns. Interviews with implementation actors revealed that the Columbus Development Department feared well organized and vocal citizen's groups who could potentially disrupt the implementation process. These community action groups played important organizing and communication roles for disenfranchised Columbus citizens. In the face of vocal and well organized community group participation, Development Department officials defused controversy by responding to many of these group's concerns. All five of the chosen target areas had strong community organizations

which were vocal throughout the grant application process. The 1983 Columbus CDBG implementation process reveals that for low and moderate income citizens whose neighborhoods are not represented on the CD Task Force, community group participation is the most meaningful vehicle for affecting who governs, how the funds are used, and who benefits.

As the implementation literature suggests, bureaucrats like citizen participation that they can control. It is not surprising then, that while city council, CD Task Force, and community group members have been strongly supportive of citizen participation, Development Department bureaucrats are less supportive of citizen input into the CDBG application process. Community and interest group members, and many citizens attending target area community meetings perceived that the Development Department was not interested in obtaining citizen input. When asked, "are there problems in implementing the citizen participation element of the CDBG program in Columbus?" two senior Development Department officials responded:

There will never be citizen participation. Citizens should not participate.

Citizen participation is a pain in the ass. The objective of bureaucrats is to minimize controversy. People are so adamant in their distrust of the city that it has destroyed the atmosphere of openness.

Despite the Development Department's ability to control the formal citizen participation mechanism by formulating the
agenda, numerous Development Department officials viewed citizen participation as an obstacle to successful program implementation. In an environment of bureaucratic hostility towards citizen participation, it is not surprising that conflict oriented participation between community action groups and decision makers was the most viable form of citizen participation for disenfranchised citizens in the 1983 grant application process.

CITIZEN'S PERCEPTIONS OF CDBG NEIGHBORHOOD MEETINGS

Telephone interviews with citizens who attended community meetings in the Southside One, Bellows, and Harrison West target areas revealed overall citizen agreement regarding meeting attendance, perceptions of the Development Department's response, and hopefulness of solving problems in citizen's respective neighborhoods. These findings are supportive of the participatory democrats' conclusion that participation in a community setting contributes to the education of the citizenry.

Many citizens who attended community meetings in the Harrison West, Bellows, and Southside One target areas believed that the meetings played a valuable educational function. To these citizens, the meetings provided CDBG program information and knowledge regarding other citizen's needs. When asked, "did you attend the meeting to repre-
sent your own concerns, your community's concerns, or both?" one Southside One resident identified the community's needs and said, "my home is not the only problem in this neighborhood." A Harrison West resident also linked her concerns with the concerns of the larger community by arguing that "whatever affects me, affects them too." As table seven reveals, forty three citizens attending neighborhood meetings linked community concerns with personal concerns. Only eleven of the sixty five citizens responding stated that personal needs guided their decisions to attend the neighborhood meeting.

Table 7

Citizens' Motivations for CDBG Meeting Attendance

<table>
<thead>
<tr>
<th>Responses</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Needs</td>
<td>11</td>
</tr>
<tr>
<td>Community's Needs</td>
<td>11</td>
</tr>
<tr>
<td>Both</td>
<td>43</td>
</tr>
</tbody>
</table>

*Citizens who attended Harrison West, Southside One, and Bellows target area neighborhood meetings were asked to respond to the following question: "Did you attend the meeting to represent your own concerns, your community's concerns, or both?"

Table eight reveals that thirty five of the sixty five respondents cited acquiring information as their explanation for attending the CDBG meetings.
Table 8

Citizens' Explanations for CDBG Meeting Attendance

<table>
<thead>
<tr>
<th>Responses</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neighborhood Improvement</td>
<td>21</td>
</tr>
<tr>
<td>Information</td>
<td>35</td>
</tr>
<tr>
<td>Desire Home Improvements</td>
<td>9</td>
</tr>
</tbody>
</table>

W=65

Citizens who attended Harrison West, Southside One, and Bellows target area neighborhood meetings were asked to respond to the following question: "Why did you attend the CDBG hearing?"

As chapter five suggests, community and interest group members, and many citizens attending target area community meetings perceived that the Development Department was not interested in obtaining citizen input. But as table nine reveals, thirty eight of the sixty responding citizens perceived that their participation would increase the likelihood that the Department of Development would respond to their needs. Forty three of the sixty respondents were hopeful that there are ways to solve problems in their neighborhood. The clear majority of citizens perceived that their participation would affect Development Department decisions regarding where and for what purposes CDBG money would be spent in target area neighborhoods. These findings support the participatory democratic conclusion that political participation in the community is associated
with an increase in political efficacy among those participating.

Table 9

Citizens' Perceptions of Development Department

<table>
<thead>
<tr>
<th>Responses</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>38</td>
</tr>
<tr>
<td>No</td>
<td>5</td>
</tr>
<tr>
<td>Maybe</td>
<td>6</td>
</tr>
<tr>
<td>Don't Know</td>
<td>11</td>
</tr>
</tbody>
</table>

n=60

Citizens who attended Harrison West, Southside One, and Bellows target area neighborhood meetings were asked to respond to the following question: "Do you feel that your participation at the meeting increases the likelihood that the Department of Development will respond to your needs?"

Table 10

Citizen's Perceptions of Solving Neighborhood Problems

<table>
<thead>
<tr>
<th>Responses</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>43</td>
</tr>
<tr>
<td>No</td>
<td>5</td>
</tr>
<tr>
<td>Maybe</td>
<td>5</td>
</tr>
<tr>
<td>Don't Know</td>
<td>7</td>
</tr>
</tbody>
</table>

n=60

Citizens who attended Harrison West, Southside One, and Bellows target area neighborhood meetings were asked to respond to the following question: "Having attended this meeting, do you feel hopeful that there are ways to solve problems in your neighborhood?"
LESSONS FOR PARTICIPATORY DEMOCRATS

This empirical study of the 1983 CDBG Columbus citizen participation process reveals that implementation problems hinder meaningful and effective citizen participation. These practical problems must be confronted by those who call for increased citizen participation in community decision making.

The lack of meaningful and timely program information available to the citizenry has hindered establishing meaningful and effective citizen participation in Columbus. As discussed earlier, CD Task Force members lack the staff, time, and technical expertise that is needed to comprehend the intricacies of a complex federal program. As a result, many Task Force members viewed their participation as futile and attended meetings sporadically. The problem of how to motivate citizens to attend community meetings challenges those who call for increased citizen participation. Task Force attendance was often sparse and few Columbus citizens attended the open city meetings to discuss the selection of target areas and the distribution of program benefits. Problems of time, money, lack of education, and information were identified by implementation actors as reasons for the poor attendance.

The 1983 formal Columbus citizen participation process also supports the argument that citizen participation may
be merely symbolic participation. As a reactive, advisory body, the Task Force legitimated Development Department programmatic decisions and offered little meaningful input into the 1983 target area selection process. The framework for decisionmaking was set by the Columbus Development Department and citizen participation entered into the process after the Development Department offered their programmatic recommendations. Few substantial changes were made in Development Department recommendations by the Task Force and city council. Despite the lack of meaningful Task Force citizen participation, numerous implementation actors praised the formal Columbus citizen participation process. These actors referred to the number of meetings and the commitment on the part of Columbus city officials in considering citizen's needs. These findings reveal that it is possible to have a formal citizen participation mechanism without having meaningful and effective citizen participation. This symbolic participation may actually work to impede meaningful participation as citizens become even more disenfranchised and alienated upon realizing that their participation may have little effect upon decision making. Another possibility is that citizens will perceive their participation to be meaningful and effective when in reality their participation actually has little impact upon who governs, how the funds are used, and who benefits.
Among the three forms of bureaucratic enfranchisement open to the Columbus citizenry, community group participation was the most effective form of participation in affecting overall program performance. Community action groups played important mobilizing and organizing roles and articulated the concerns of low and moderate income groups previously disenfranchised from the decision making process. The 1983 Columbus CDBG implementation process supports the conclusions that bureaucrats like to minimize controversy and like citizen participation that they can control. Vocal community group participation threatens this stable decision making environment and bureaucrats attempted to defuse this conflict by offering various program benefits.

In a time of increased resource scarcity, we can expect increased conflict between Columbus implementation actors over who should govern, how the funds should be used, and who should benefit. Underlying this increased conflict will be major disagreements over whether CDBG funds should be used for distributive or redistributive purposes. In the absence of clear legislative goals and active HUD oversight, Columbus Development Department bureaucrats have emphasized the distributive elements of the CDBG program. The 1983 grant application process focused on economic development activities, while numerous community and inter-
est group members, city council and CD Task Force members, and citizens complained that the redistributive elements of the CDBG program and thus the concerns of low and moderate income citizens were ignored. The zero-sum environment of clear winners and losers and the bureaucratic discretion which accompanies the implementation of a block grant program increases the likelihood that the concerns of disenfranchised low income citizens will be ignored. For these citizens, participation in a vocal community organization is of vital importance. As President Reagan emphasizes the block grant allocation approach and returns responsibility for basic services to states and localities, we can expect to see a proliferation in the number of conflict oriented community groups who attempt to articulate the needs of disenfranchised low and moderate income citizens in a zero sum environment of resource scarcity.

**BUREAUCRATIC ACCOUNTABILITY IN A DEMOCRATIC SOCIETY**

This section examines three possible solutions for holding urban bureaucrats accountable to the citizenry: 1) clarity in legislative goals and standards; 2) increased citizen participation; and 3) active community group participation.

Vague legislative goals and standards fostered conflict between implementation actors over the proper role of citi-
zen participation in the grant application process and led to confusion over who should govern, how the funds should be used, and who should benefit. The vague and contradictory CDBG legislative language has also led to local implementation confusion over whether the distributive or redistributive elements of the program should be emphasized. And finally, the legislation ignores who comprises low and moderate income individuals and what role they should play in the grant application process. All of these factors have increased local bureaucratic discretionary decision-making in Columbus. One solution for reducing bureaucratic discretion is the writing of clear legislative goals and standards at the national level. This view is espoused by Lowi in *The End of Liberalism*. While Lowi's solution would clearly force street level bureaucrats to adhere to strict guidelines in implementing federal programs, it ignores the politics of legislation writing at the national level. As the congressional literature suggests, members of Congress write vague legislation in order to appease numerous competing interest groups. Also, congressional members who are interested in re-election will be unwilling to write clearly defined legislation that will hold them accountable if there are implementation failures at the state and local level. In addition, many legislators view bureaucratic discretion as a key component of intergovernmental rela-
tions and will likely be unwilling to alter established federal/local relationships. Lowi's prescription for achieving bureaucratic accountability through clearly written goals and standards is a worthwhile goal, but it is unrealistic given the national political environment at the national level.

Citizen participation in urban decisionmaking is often identified as the link between bureaucratic accountability and the citizenry. But the 1983 Columbus CDBG grant application process revealed numerous implementation problems in establishing a viable citizen participation mechanism. Poor attendance at community meetings, inadequate representation on the CD Task Force, and lack of citizen information and other resources, are problems that must be corrected if citizen participation is to be meaningful and effective. Several implementation actors argued that since citizen participation impedes successful program implementation, it should be eliminated. From this vantage point, knowledgeable Development Department bureaucrats, with their technical information and expertise, should govern the CDBG application process. This perspective ignores the possibility that successful citizen participation can be achieved. Suggestions for achieving meaningful and effective citizen participation in Columbus will be outlined in chapter seven.
Vigorous community and interest group participation is a third possible means for insuring bureaucratic accountability. This "street fighting pluralism" would insure that various neighborhood concerns are represented in the grant application process. But as Yates suggests, it would also lead to a highly fragmented, conflictual, and decentralized policy implementation environment. This group participation could work to delay the decision making process and ultimately impede timely distribution of program benefits. Yet group participation plays the invaluable role of organizing and mobilizing disenfranchised citizens to participate in the grant application process. For citizens who do not wish to participate, their concerns will likely be represented through community and interest group participation. Chapter seven examines the possibility that vigorous community and interest group participation could enhance overall program implementation in Columbus.

**IMPLICATIONS FOR POLICY IMPLEMENTATION, URBAN SERVICE DELIVERY, AND DEMOCRATIC POLITICAL THEORY**

The evaluation of the 1983 Columbus CDBG implementation process confirms the value of using the bureaucratic discretionary model as a guide to implementation research. Specifically, the Van Meter and Van Horn conceptual implementation framework has been reinforced. In the absence of
clearly communicated legislative goals and standards, street level Development Department bureaucrats have the discretionary power to make the important decisions regarding the selection of target areas and the distribution of benefits. In addition, the Columbus HUD office has played a limited oversight and enforcement role, and this has fostered bureaucratic discretionary decisionmaking in the absence of clearly defined legislative objectives and standards. This research has also revealed that Development Department bureaucrats are the principal implementation actors because they possess the resources, staff, and time that is needed to implement the Columbus CDBG program.

The 1981 Reagan reforms have affected the Columbus CDBG implementation process in a number of ways. There has been a return to the "hands off" federal government role that characterized the Ford era. As a result of the Reagan reforms, there is an emphasis on using CDBG funds for distributive purposes (e.g. economic development activities) rather than directly aiding low and moderate income individuals. The Reagan reforms have also led to a perception of increased resource scarcity as federally funded programs, such as CETA, have been cut considerably. All of these reforms fostered increased bureaucratic discretionary decisionmaking in the absence of clear legislative goals and standards, and limited enforcement and oversight by HUD.
This bureaucratic discretionary decisionmaking in an environment of increased resource scarcity has led to conflict in the implementation of the Columbus CDBG program over who governs, how the funds are used, and who benefits. Due to methodological shortcomings, it is not possible to ascertain empirically whether the goal of aiding low and moderate income groups is being reached satisfactorily.

Interviews with local implementation actors revealed conflicting views regarding the redistributive aspects of the CDBG program. Development Department bureaucrats, HUD bureaucrats, and city council members believed that the city has made a determined attempt to achieve this goal, while members of the CD Task Force and community and interest group members perceived that low income groups have been ignored in the distribution of CDBG program benefits.

The 1983 Columbus grant formulation process was characterized by local implementor confusion and conflict over the precise role of citizen participation in the absence of clear policy standards. Despite the Reagan administration's elimination of statutory requirements for citizen participation, Columbus has not reduced its citizen participation requirements. But community and interest group members, unlike Development Department and HUD bureaucrats and city council members, perceived that the quality of low and moderate income citizen participation was reduced considerably in 1983.
While city council, CD Task Force, and community group members have been strongly supportive of citizen participation, Development Department bureaucrats have been less supportive of citizen input into the CDBG application process. Community and interest group members, and many citizens attending target area community meetings perceived that the Development Department was not interested in obtaining citizen input. These perceptions led to increased conflict between citizens and Development Department bureaucrats over the role of the citizenry in the CDBG grant application process.

Much of the controversy over citizen participation emanated from concerns regarding the CD Task Force. Community group, city council, Development Department, and Task Force members perceived the CD Task Force as a weak citizen participation mechanism. The Task Force has served as a watchdog over the grant application process, and as a communication channel for those neighborhoods it represents, but it suffered from poor attendance at weekly meetings, a lack of information, money, and staff resources, and representation which promotes only the self interest of areas from which members come. As a reactive, advisory body, the Task Force legitimated Development Department programmatic decisions and offered little input into the 1983 target area selection process.
In the absence of effective Task Force and individual citizen participation, community group participation was the most effective form of participation in affecting who governed, how the funds were used, and who benefitted from the 1983 CDBG implementation process. Community group participation served an effective mobilizing function for low and moderate income citizens. In addition, community group organizations insured that the concerns of various low and moderate income neighborhoods were articulated at the city-wide meetings.

Yet active community group participation fostered a highly fragmented and conflictual policy implementation environment that was characterized by "street fighting pluralism." Instead of unifying low and moderate income neighborhoods, the Columbus citizen participation process fragmented class interests and emphasized individual neighborhood concerns as Columbus neighborhoods competed against each other for limited program benefits in an environment of increased resource scarcity.

Citizens who attended target area community meetings in the Southside One, Bellows, and Harrison West target areas perceived that the meetings played a valuable education function. To these citizens, the meetings provided CDBG program information and knowledge regarding other citizen's needs. In addition, the clear majority of citizens per-
ceived that their participation might increase the likelihood that the Department of Development would affect Development Department decisions where and for what purposes CDBG money would be spent in target area neighborhoods.

This research also supports several conclusions offered in the urban politics literature. The findings reinforce the argument that urban policy implementation and service delivery is non-redistributive. With weak mayoral leadership and an overworked city council, Columbus Development Department bureaucrats emerged as the most important implementation actors. The politics of privatism has been reinforced in Columbus, as unelected bureaucrats have the most influence on the CDBG application process. But unlike other studies of policy implementation and urban service delivery, this research did not find a coherent economic network of local officials who had a disproportionate impact on the distribution of program benefits.
Chapter VII
POLICY RECOMMENDATIONS

The 1983 Columbus CDBG implementation process has provided a rich context for identifying citizen participation limitations and assessing the possibilities for achieving meaningful and effective citizen participation. The lack of meaningful and timely program information available to the citizenry, the poor citizen attendance at the citywide hearings, and the symbolic nature of Task Force participation all hindered the effectiveness of the Columbus citizen participation process. This chapter offers policy suggestions for improving the Columbus citizen participation process in light of the previous empirical analysis. It will be argued that if the proper decision making structure is established, citizens can play a positive role in communicating neighborhood needs and concerns to local political officials, insure that various neighborhood needs are considered in the decision making process, and thus hold bureaucrats accountable to the citizenry in a democratic society. The underlying assumption of this chapter and dissertation research is that policy practitioners who con-
Suet implementation research can make an important contribution to the discipline, students in the classroom, and the larger society by addressing these important citizen participation questions:

1. What are the advantages and disadvantages of leaving policy implementation to local political officials?

2. In what ways might citizen participation be a positive influence in the CDBG implementation process?

3. What are the central obstacles to achieving meaningful and effective citizen participation? How might each of these problems be overcome?

4. How might successful citizen participation be achieved?

**Bureaucratic Discretion and Policy Implementation**

From the vantage point of numerous Columbus Development Department bureaucrats, citizen participation has impeded successful program implementation in several ways. Bureaucrats cited the lengthy and time-consuming decision-making process that accompanies the formal citizen participation mechanism and delays important decisions regarding the distribution of CDBG grants. Others pointed out that the same citizens continually participated at the citywide hearings...

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year after year and few new citizens have become actively involved in the grant application process. Third, citizen participation heightens controversy and conflict over decisions and makes the job of the bureaucrat much more difficult. Finally, several bureaucrats argued that citizens should not participate in the decision making process because they do not have the ability or desire to grasp the complexities of the CDBG program. From this vantage point, bureaucratic experts should have the most input into the grant distribution process because they have the time, staff, and technical expertise needed to implement a complex federal program successfully.

Unlike many of the CD bureaucrats, citizen activists and elected officials argued that citizen participation is needed to hold bureaucrats accountable in a democratic society. To these citizens, bureaucratic control of the policy implementation process threatens democratic principles and insures that certain Columbus neighborhoods will not have their concerns represented in the Columbus implementation process. Second, proponents of this perspective argued that citizens can play a valuable role in communicating neighborhood needs to bureaucrats and elected officials. Third, these citizens argued that conflict in a time of increased resource scarcity is unavoidable, necessary, and often beneficial to insure bureaucratic account-
Finally, proponents of this perspective argue that citizens should participate in those community decisions affecting the quality and direction of their lives. This participation will heighten their sense of efficacy and enhance their political education.

**Columbus Citizen Participation Obstacles**

This evaluation of CDBG program implementation reveals numerous barriers to achieving meaningful and effective citizen participation in Columbus. Since citizen participation has not been a key issue on the local agenda, there has been no mechanism for allowing citizens from various low and moderate income neighborhoods to establish their political credibility and offer meaningful input into the CDBG grant application process. Hostility on the part of influential Development Department bureaucrats towards citizen participation, and the acknowledged weaknesses of the CD Task Force have also impeded the overall effectiveness of citizen participation. Informed communication between citizens and local decision makers must be established over a period of time. Historically, the Columbus implementation environment has been characterized by its notable lack of communication between various neighborhoods and Development Department bureaucrats and city council members. The 1983 grant application process revealed that these communication problems are still prevalent.
A second set of citizen participation problems emanate from the fact that Columbus neighborhoods are artificially created boundaries determined by urban planners. The sense of community that is vital to a successful participatory setting is clearly lacking in Columbus. Instead of unifying low and moderate income neighborhoods, and encouraging citizens to link their own concerns with the larger community, the Columbus citizen participation process fragmented class interests and emphasized individual neighborhood concerns. Columbus neighborhoods, acting as autonomous units, competed against each other for limited program benefits in an environment of increased resource scarcity.

**CITIZEN PARTICIPATION POLICY SUGGESTIONS**

The remainder of this chapter offers suggestions for achieving meaningful and effective citizen participation in Columbus, and assesses the prospects for reaching this goal. As Ronald Mason suggests, effective and meaningful citizen "participation is most clearly evident when the community members of the policy setting and decision makers are one and the same, although participation may be witnessed also in acts influencing decision makers and administrators of policy."[^291] This definition suggests that citizens must be given an important policy making role if effective and meaningful citizen participation is to be

[^291]: Mason, p. 28.
achieved. Perhaps identifying citizens as "policy makers" rather than merely "policy advisors" would aid overall program attendance. As Jack DeSario suggests, "if citizens are given an important policy making role, they are more likely to be committed to the planning process."292

The stages of the implementation process where citizens are involved also affects the quality of citizen participation. In Columbus, citizen participation most often occurs after the Columbus Department of Development has collected its data regarding potential target areas. The agenda has been set by the time that citizen participation enters into the process. As a result, the CD Task Force often merely legitimates Development Department target area recommendations to city council. If citizens are directly involved in target area selection and the gathering of data regarding Columbus neighborhoods in the early stages of program implementation, perhaps meaningful and effective citizen participation can be achieved.

If citizens are to engage in meaningful and effective citizen participation, they need the timely information and resources to understand the CDBG program. During 1983 Task Force meetings, Development Department officials provided Task Force members with technical program information the

night of an important policy decision. Task Force members must be given this technical information early in the grant application process. In addition, Task Force members need to work much more closely with Development Department staff assistants in acquiring and comprehending the relevant program information. As Walter Williams suggests, "citizens need both sound, relevant, timely information and the technical knowledge to employ it effectively in the local policy process."293

Third, the structure and the mode of representation on the CD Task Force needs to be modified. Currently, areas are only eligible for Task Force representation if they have previously received CD money. In addition, to gain current Task Force membership, individuals must obtain the approval of remaining Task Force members and Development Department bureaucrats. This narrow representation emphasizes individual neighborhood concerns rather than the needs of the entire Columbus community. All Columbus neighborhoods must have one representative on the CD Task Force. These representatives and their alternates should be elected by their respective neighborhoods every two years. This form of representation will work to insure that Task Force representatives adequately represent the needs of their areas. The chairman of the CD Task Force

should be elected by fellow Task Force members every two years. These reforms will aid in democratizing the CD Task Force and insure that the needs of low and moderate income residents are considered. The CD Task Force will better confront Columbus neighborhood needs if subcommittees of Task Force members, bureaucrats, and city council members are formed to deal with specific community development concerns. These areas might include displacement, housing rehabilitation, economic development, aiding low and moderate income residents, and the 3% loan program. The formation of subcommittees offers subcommittee members the opportunity to intensively study a specific aspect of community development policy and develop technical expertise. Specific policy recommendations can then be made to the CD Task Force for consideration.

Finally, citizens, bureaucrats, and local political officials need to be educated regarding the strengths and weaknesses of their communities and the potential benefits to be gained from a viable citizen participation mechanism. Local implementation actors need to be educated regarding the potential problems of their communities over the long term, and the importance of creating a community development strategy for the future. Perhaps urban planners, with their knowledge of Columbus neighborhoods, can play a leadership role in the education process.
In addition to these specific policy recommendations, citizens, bureaucrats, and local political officials must be educated regarding the strengths and weaknesses of their communities and the importance of establishing a viable citizen participation mechanism. Citizens need to recognize the difficult role played by bureaucrats and elected officials in allocating scarce resources among competing neighborhoods. And bureaucrats and local political officials must recognize that if structured properly, citizen participation can play an important communication and policy-making role. Local implementation actors need to recognize the importance of creating a viable community development strategy for the future. The emphasis on education will hopefully lead to increased citizen participation in community meetings and a recognition of the importance of informed debate over policy direction that is the key element of a viable democracy.

FUTURE CITIZEN PARTICIPATION PROSPECTS

Overall, the Columbus CDBG application process revealed numerous implementation problems in establishing a meaningful and effective citizen participation mechanism. The lack of timely program information available to the citizenry, the poor citizen attendance at the city-wide hearings, and the symbolic nature of Task Force participation
all hindered the effectiveness of the Columbus citizen participation process during 1983. For participatory democrats, these are depressing conclusions. Yet it may be that an urban area with artificially created neighborhoods is unlikely to be the setting for achieving meaningful and effective citizen participation. Perhaps we can expect this kind of participation to be achieved in the New England town meeting setting where there is an emphasis on informed debate and a concern for the larger community.

But the implications of this study are not totally depressing for participatory democrats. As chapter six reveals, citizens attending target area community meetings perceived that the meetings played a valuable education function. To these citizens, the meetings provided CDBG program information and knowledge regarding other citizen's needs. Rousseau's and Hill's conviction that active citizen participation will lead to the participants' realization of citizenship receives support in this study.

In a time of increased resource scarcity, conflict between implementation actors over who should govern, how the funds should be used, and who should benefit, will continue to characterize the implementation process. A meaningful and effective citizen participation mechanism that adequately represents the concerns of all Columbus neighborhoods must be introduced to the local policy agenda.
This study reveals that there are numerous barriers that impede the realization of this goal. In the absence of meaningful and effective citizen participation, disenfranchised citizens should look to bureaucrats and local officials who may have a genuine desire to respond directly to the needs of low and moderate income residents. In addition, this study reveals the value of community group organizing at the local level. Low and moderate income citizens must recognize the importance of mobilizing their interests and pressuring decisionmakers to respond to their concerns. At the same time implementation actors need to acknowledge the potential value of establishing a viable citizen participation mechanism that stresses open communication and informed discussion between citizens, bureaucrats, and local political officials. For citizen participation is the link between bureaucratic decisionmaking and the concerns of the citizenry in a viable democracy.
Appendix A

COMMUNITY DEVELOPMENT MEETING SCHEDULE

1. February 9, 1983--Community Development Task Force Meeting
2. February 17, 1983--Citizens' Forum
3. March 2, 1983--Community Discussion
4. March 9, 1983--Community Discussion
5. March 16, 1983--Community Discussion
6. March 23, 1983--Community Development Task Force Meeting
7. March 28, 1983--City Council Meeting
8. March 31, 1983--Citizens' Forum
9. April 13, 1983--Community Discussion
10. April 20, 1983--Community Discussion
11. April 27, 1983--Community Development Task Force Meeting
12. May 16, 1983--City Council Meeting
13. May 18, 1983--City Council Public Hearing
14. May 23, 1983--City Council Meeting
15. June 1, 1983--Community Development Task Force Meeting
16. June 2, 1983--Bellows Community Meeting
17. June 28, 1983--Harrison West Community Meeting
18. July 7, 1983—Bellows Community Meeting
19. August 2, 1983—Southside One Community Meeting
20. August 16, 1983—Harrison West Community Meeting
21. September 1, 1983—Southside One Community Meeting
Appendix B

INTERVIEW TIMETABLE

1. Department of Development Bureaucrats: May-September 1983
2. City Council Members: September-November 1983
3. Community Development Task Force Citizens: June-October 1983
4. Community and Interest Group Members: August-November 1983
5. Local HUD Officials: August 1983
6. Citizens in 3 Chosen Target Areas: June-November 1983

*All interviews with Department of Development bureaucrats and local HUD officials were conducted in person, while twelve out of twenty seven interviews with Community Development Task Force members were personal interviews. All other interviews were telephone interviews.
Appendix C
HUD AND DEVELOPMENT DEPARTMENT BUREAUCRATS' QUESTIONNAIRE

1. Name:

2. Role in the Community Development Block Grant Program:

3. Position:

The following questions are an attempt to compare your attitudes toward the Community Development Program with your attitudes toward other federal programs---especially the War on Poverty Programs and the Model Cities Program.

4. Have you been a part of any programs other than the current Community Development Block Grant Program that were federally funded? Name and explain your role.

5. How do you compare the Community Development Program with past federal programs (especially those of the 1960s)?
6. Which program gave you the most discretion or freedom to make decisions according to your own priorities—the current Community Development Program or some federal program of the 1960s?

7. Of the programs that I just mentioned to you, which do you like the best? Why?

8. Do you think that projects previously funded under Model Cities or other federal programs should get a higher priority in the Community Development Program than projects previously funded?

9. How does your current position bring you into contact with the Community Development Block Grant Program?

10. Do you have any responsibilities with respect to the implementation of the citizen participation element of the CDBG program in Columbus?

11. In your current position, do you advocate a position when aiding in the implementation of public policy?

12. What do you think the priorities should be for bureaucrats who engage in the implementation of public policy?

13. What changes can you identify in the implementation of the CDBG program in Columbus under President's Ford, Carter, and Reagan?

14. What has been will be the impact of the Reagan reforms on the overall implementation of the CDBG program? On the citizen participation element?
15. Are there problems in implementing the CDBG program in Columbus? If so, what are they? How might the overall implementation be improved?

16. Are there problems in implementing the citizen participation element of the CDBG program in Columbus? If so, what are they?

17. What kind of an impact has citizen participation had on the distribution of CDBG grants in Columbus?

18. What has been the impact of citizen participation on the implementation of the CDBG program in Columbus?

19. What do you perceive the impact of citizen participation to be this year on the implementation of the CDBG program in Columbus and the overall distribution of program benefits?

20. What are the goals of the CDBG program? Do you think that these goals are being reached in Columbus?

21. Who has the greatest impact with respect to the distribution of CDBG grants in Columbus?

22. Do you feel that citizen participation in the CDBG program is meaningful or symbolic? Why?
Appendix D

CITY COUNCIL QUESTIONNAIRE

1. How long have you been a member of city council?
2. As a member of city council, what role do you have with respect to the Columbus Community Development Block Grant program?
3. Do you have any responsibilities with respect to the implementation of the citizen participation element of the CDBG program?
4. What role does the city council play in the selection of target areas? What role should it play?
5. What factors determine target area selection?
6. Are you satisfied with the selection of target areas over the next three years? Why or why not?
7. What changes can you identify in the implementation of the CDBG program in Columbus under President's Ford, Carter, and Reagan?
8. What has been the impact of the Reagan reforms on the overall implementation of the CDBG program? On the citizen participation element?
9. Are there problems in implementing the CDBG program in Columbus? If so, what are they? How might the overall implementation be improved?

10. Are there problems in implementing the citizen participation element of the CDBG program in Columbus? If so, what are they?

11. Do you feel that the CD Task Force is an effective or ineffective vehicle for citizen participation? Why?

12. What kind of an impact has citizen participation had on the distribution of CDBG grants in Columbus?

13. What has been the impact of citizen participation on the implementation of the CDBG program in Columbus?

14. What do you perceive the impact of citizen participation to be this year on the implementation of the CDBG program in Columbus and the overall distribution of program benefits?

15. What are the goals of the CDBG program? Do you think that these goals are being reached in Columbus?

16. Who has the greatest impact with respect to the distribution of CDBG grants in Columbus?

17. How often do you speak to the mayor regarding the CD program? What kind of an impact does he have with respect to the distribution of program benefits?

18. How often do you speak to Department of Development officials regarding the CD program?
19. How often do individual citizens contact you regarding the CDBG program? What kind of an impact do they have with respect to the distribution of program benefits?

20. How often do representatives from community groups and organizations contact you regarding the CDBG program? What kind of an impact do they have with respect to the distribution of program benefits?

21. How often do you speak to members of the CD Task Force? What kind of an impact do they have with respect to the distribution of program benefits?

22. What are the strengths and weaknesses of the CD Task Force?

23. Do you feel that citizen participation in the CDBG program is meaningful? Why?

24. If there was no citizen participation, would the distribution of CD funds be any different? Why or why not?

25. How might the overall citizen participation process be improved?
Appendix E

INTEREST AND COMMUNITY GROUP MEMBER QUESTIONNAIRE

1. What is the name of your organization? How long have you been affiliated with this organization?
2. What is the purpose of your organization?
3. Why did your organization become involved in the Community Development Block Grant program?
4. Describe the project that you wanted the CDBG program to fund.
5. Describe the process you went through in your attempt to have this proposal included in the CD grant application. What people did your group approach? Why did you contact these people?
6. Have you had projects funded by CDBG funds in the past? If so, what were they?
7. How have decisions been made regarding the distribution of CD money, and what groups and individuals have been most influential in making them?
8. Have you noticed any differences in this process from last year to this year? If so, what are those differences?
9. Do you agree with the selection of target areas? Why or why not?

10. Why do you think that these four target areas were selected?

11. What impact has your organization had on the selection of target areas? In what ways do you feel that you affected the decision?

12. If there was no citizen participation, would the outcome have been any different?

13. Are there problems in implementing the citizen participation element of the CDBG program in Columbus? If so, what are they?

14. What kind of an impact has citizen participation had on the distribution of CDBG grants in Columbus?

15. What has been the impact of citizen participation on the implementation of the CDBG program in Columbus?

16. What are the goals of the CDBG program? Do you think that these goals are being reached in Columbus?

17. Are there problems in implementing the CDBG program in Columbus? If so, what are they? How might the overall implementation be improved?

18. Who has the greatest impact with respect to the distribution of CD grants in Columbus?

19. Would you say that the planning and implementation process has been relatively open or relatively closed to individual and group participation?
20. Do you feel that citizen participation in the CD program is meaningful? Why or why not?

21. Are you satisfied with the results that your organization has achieved thus far in terms of securing CD benefits? If yes, why? If no, why not?

22. What kind of relationship has your organization maintained with the Department of Development?

23. What kind of relationship has your organization maintained with city council?

24. What kind of relationship has your organization maintained with the mayor's office?

25. What impact has your organization had on the planning and implementation of this program?

26. In general, how much say or influence do you feel that you have on what goes on in your community?

27. Can you identify for me other organizations and/or individuals involved in the planning and implementation of this project?
Appendix F

TASK FORCE QUESTIONNAIRE

1. What area of Columbus do you represent?

2. How long have you served on the Community Development Task Force?

3. In your opinion, what is the role of the Community Development Task Force? What role should it have?

4. What role do you feel that the Community Development Task Force has in the decision making process regarding the distribution of CDBG funds? What role should it have?

5. As an individual member on the task force, do you feel that you have an effect on whether CDBG funds are used for projects in your neighborhood? Why or why not?

6. Do you think that the CD task force has any effect on the Department of Development's decisions regarding the distribution of program benefits? Why or why not?

7. What kind of an impact has citizen participation had on the distribution of CDBG grants in Columbus?

8. In your opinion, will there be any differences regarding the impact of citizen participation on the distri-
9. What has been the impact of citizen participation on the implementation of the CDBG program in Columbus?

10. What do you perceive the impact of citizen participation to be this year on the implementation of the CDBG program in Columbus and the overall distribution of program benefits? Does this differ from previous years? If so, how?

11. What are the goals of the CDBG program? Do you think that these goals are being reached in Columbus? Why or why not?

12. In your opinion, what determines where CCEG funds are distributed in Columbus? Why and how?

13. Do you feel that citizen participation in the CDBG program is meaningful? Why?

14. Are there problems in implementing the CCEG program in Columbus? If so, what are they? How might the overall implementation be improved?

15. Are there problems in implementing the citizen participation element of the CCEG program in Columbus? If so, what are they? How might the overall implementation be improved?

16. Do you see the CD Task Force as a political organization? If yes, in what way? If no, what kind of organization is it?
17. In your opinion, how important is the work of the task force?

18. What would you say are some of the things the task force tries to get done?

19. What do you consider the greatest accomplishments of the task force?

20. What are the weaknesses of the task force?
Appendix G
CITIZEN PARTICIPANT QUESTIONS

1. Why did you attend the CDBG hearing?
2. Did you attend the meeting to represent your own concerns, your community's concerns, or both?
3. Were you satisfied with the results of the meeting?
4. Did you ask any questions or make any statements at the meeting? Why or why not? What did you say or ask? What was your purpose in making the statement?
5. Were you satisfied with the response you received? Why or why not?
6. Do you feel that your participation at the meeting increases the likelihood that the Department of Development will respond to your needs? Why or why not?
7. Do you feel that citizen participation in the CDBG program is an effective means for citizens like you to have input into the grant distribution process? Why or why not? If not, how might the citizen participation process be improved?
8. Have you attended previous CDBG meetings? Why or why not?
9. Did your attendance at the previous meeting affect you in your decision to attend this meeting? Why or why not?

10. Do you think that you will attend future CDEG meetings? Why or why not?

11. "We know that the ordinary person has many problems that take his time." In view of this, what part do you think the ordinary person ought to play in the community affairs of his town or neighborhood?

12. Suppose a decision were being considered by the Department of Development that would have a harmful effect on your neighborhood. What do you think you could do?

13. If you made an effort to change this decision, how likely is it that you would succeed?

14. If such a case arose, how likely is it that you would actually do something about it?

15. Having attended this meeting, do you feel hopeful that there are ways to solve problems in your neighborhood?

16. Do you think that the Department of Development will consider your concerns? Why or why not?

17. Has your attending the community meetings affected your views regarding the CDBG program? Why or why not?
Appendix H

POLICY IMPLEMENTATION FRAMEWORKS
I. Policy Standards and Resources
   Adequacy of funding and other incentives.
   Degree of clarity in policy standards and objectives.
   Degree of contradictions in policy standards and objectives.
   Degree of specificity in procedures for implementing the policy.
   Degree of change required by the policy standards and objectives.

II. The National Policy Environment
   Communication: the accuracy, clarity, consistency, and timeliness of communications by federal officials.
   Enforcement: the use of norms, incentives, and sanctions by federal officials, including plan reviews, technical assistance, program reviews, evaluations, and audits.
   Policy Change: the role of national political actors and interest groups in the modification and application of the policy.

III. The Local Policy Environment
   Attitudes of local political officials and administrators toward the policy's standards and objectives, including their understanding and extent of agreement or disagreement with them.
   Attitudes of interest groups and citizens, including their understanding and extent of agreement or disagreement with them.
   Characteristics of the Local Implementing Agency: the competence of the agency staff and the degree of support they receive from political officials.
   Local Economic and Social Conditions: the extent of need for the policy and the sufficiency of resources within the jurisdiction to support it.

IV. Program Performance
   Who Governs?
   How are the Funds Used?
   Who Benefits?
Appendix I

YEARLY DISTRIBUTION OF CDBG PROGRAM BENEFITS
# Approved Ninth Year CDBG Budget

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### Program Activities

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* Projected payments to be reprogrammed into the appropriate line-item during the ninth year.

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Appendix J

TARGET AREA MAPS
General Boundaries: Bounded on the north by the I-70 freeway; on the east by Kimball Place and Studer Avenue; on the south by Whittier Street; and on the west by Parsons Avenue, Columbus Street and Gilbert Street.
General Boundaries: Bounded on the north by Fifth Avenue; on the east by an unnamed alley west of Neil, by Delaware Avenue and Henry Street; on the south by Bubbles Avenue, Harrison Avenue, and First Avenue; and on the west by Perry Street, Second Avenue, the east low water line of the Olentangy River, Third Avenue and Perry Street again.
General Boundaries: Bounded on the east by Interstate 71; on the south by the Pennsylvania Railroad tracks; on the west by the property line 740 feet east of the Conrail Railroad tracks, Starr Avenue and Cleveland Avenue, and on the north by Fifth Avenue.
General Description - bounded on the north by Sullivant Avenue; on the east by I-71 right-of-way; on the south by the I-70 right-of-way; on west by Glenwood Avenue.


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77. Smithers, Ralph W. Columbus Residential Rehabilitation Assistance Program. Columbus: Department of Development, July 25, 1983.

78. Steger, Mary Ann. "Citizen Participation in the Community Development Block Grant-Neighborhood Versus City-Level Structures." Unpublished paper. Atlanta,


