

City of Tallahassee Citizen Participation Plan

INTRODUCTION

Each year, the City of Tallahassee (City) receives funding from the U.S. Department of Housing and Urban Development (HUD). These funding sources include Community Development Block Grant (CDBG), Home Investments Partnership Program (HOME), and Emergency Solutions Grant (ESG). As a condition of receiving these allocations, the City must satisfy annual planning and reporting requirements as provided in 24 CFR Part 91 which includes the development and preparation of a Consolidated Plan, Annual Action Plans for each year of the Consolidated Plan, the Consolidated Annual Performance Evaluation Report (CAPER), and an Assessment of Fair Housing (AFH) which replaces the previously entitled Analysis of Impediments to Fair Housing.

Definitions

Consolidated Plan – This is a five-year strategic plan which describes the needs and goals for the community planning and development programs and housing programs during the designated five-year period. The City must submit it to HUD by August 15 prior to the start of the first year of the five-year period covered. This allows the City to apply for federal funding and make annual application for funding for the federal entitlement funding identified above.

Annual Action Plan – This plan is prepared each year of the Consolidated Plan and identifies the amount of funding the City expects to receive from HUD as well as the anticipated program income and reprogrammed funds. It describes the activities and projects expected to be undertaken in the subject year to address the needs and priorities that were identified in the Consolidated Plan. It is submitted to HUD by August 15 and covers the year beginning October 1 and ending September 30. Other than the first year of each 5-year plan when it is submitted simultaneously with the Consolidated Plan, it is an amendment to the Consolidated Plan.

Consolidated Annual Performance Evaluation Report (CAPER) – This is the annual report of what the City completed in the most recently program year (October 1 – September 30) and how that compares with what was anticipated to be completed as set forth in that year's Annual Action Plan. It reports on the progress made toward goals set forth in the Consolidated Plan. It describes how the funds were used and the extent to which low and moderate-income persons benefitted. It is submitted to HUD within 90 days of the program year end. Therefore, the City's deadline is December 29.

Assessment of Fair Housing (AFH) – This is an assessment done which replaces the Analysis of Impediments to Fair Housing. Using a prescribed format, the City must identify fair housing issues and related contributing factors in its jurisdiction and sets goals to overcome these. The goals must inform subsequent housing and community development planning processes. The first AFH for the City is due to HUD on or before January 5, 2020 (270 days prior to the beginning of the first program year of the first Consolidated Plan that begins on or after January 1, 2017).

Purpose of the Citizen Participation Plan (CPP)

The purpose of the CPP is to ensure compliance with 24 CFR 91.105 and provide policies and procedures for encouraging citizen input in the planning processes associated with the use of federal entitlement funds and the preparation of these plans and documents. These citizen participation policies and procedures shall be followed for the development of the Consolidated Plan, CAPERs as well as for the City's AFH and substantial or material amendments to those plans as well as substantial amendments to this CPP.

This CPP consists of a description of the public participation process to ensure opportunities for affected and other interested parties to be involved in the process, provide transparency of the process, provide access to the information and draft plans and reports, and to provide instructions to guide public submission of comments and the City's response.

The federal programs addressed in this document are primarily for the benefit of low- and moderate-income persons defined by CDBG as those households at 80% or less of area median income based on family size as provided by HUD and adjusted annually. The focus of this CPP is to encourage participation from the following populations:

- Low- and moderate-income persons
- Residents of slums, blighted areas, predominantly low and moderate-income areas
- Non-English speaking persons
- Persons with disabilities
- Public housing residents and other low-income residents of targeted revitalization areas
- Other populations that may be specifically identified by HUD

OUTREACH AND ACCOMMODATIONS

It is the City's goal to encourage participation across as many citizens as possible through outreach and accommodation of special needs, transparency of the process, and easily accessible information as described herein.

Non-English Speaking Persons

Each time a five-year plan is completed, the City will use information obtained from the American Community Surveys (ACS) or other reliable source that originates from census data to analyze the level of non-English speaking persons in Tallahassee and, therefore, make every effort to accommodate non-English speaking persons and encourage participation in the processes covered by this CPP. Currently, the American Community Survey data indicates the City is made up of primarily English-speaking citizens with approximately 12.5% speaking another language. Most of the 12.5% also speak English very well with approximately 3% of the population that does not speak English very well. This group is made up primarily of Spanish speaking citizens. Therefore, the City will make Spanish or other translators for non-English speaking citizens available if reasonably possible to do so if requested at least two days in advance of public meetings and hearings (excluding weekends and holidays).

Persons with Disabilities

While all meetings are held in accessible facilities, in the event there is a need for other special accommodations for persons with disabilities, the City will, to the extent that it is reasonably possible, make arrangements to accommodate those needs if requested at least two days in advance of public meetings and hearings (excluding weekends and holidays).

Notices, Times, and Locations of Meetings

Notices for meetings and workshops associated with the development of or substantial amendment to the Consolidated Plan, Annual Action Plan or AFH, will be placed in the local newspaper of general circulation and placed on the City's website (talgov.com) at least 14 days prior to the event. Notices provide information on the purpose of the meeting and how to receive additional information as well as contact information. If the notice solicits comments, the notice includes how and when to submit comments and access documents.

Public meetings will be held at times and locations convenient to potential and actual beneficiaries. Generally, every attempt is made to hold the first meeting in a targeted area such as the Neighborhood Revitalization Strategy Area (NRSA) location. The City's Housing Division is currently located in the City's only NRSA in an ADA compliant building with generous parking. The final public hearing, which is held in conjunction with the City Commission meeting, is held at 6:00 PM at City Hall, an accessible, central location, unless otherwise noted in the notice placed in the local newspaper of general circulation and on the City's official website.

Reports and Materials Availability

All reports and materials subject to the CPP will be made available to the public, including in an accessible form for persons with disabilities, upon request and when reasonably feasible to do so. These documents are available at the City's Housing Division and are posted on the City's official website. They are available in electronic or printed form. A reasonable number of printed copies will be available upon request.

Access to Records

Residents of the community, public agencies, and other interested parties shall be provided timely access to information and records relating to the AFH, Consolidated Plan, Annual Action Plan, and substantial amendments related to the use of the funds providing assistance under programs which are subject to this Citizen Participation Plan for as much as the preceding five years.

Consultation

The City must consult with adjacent local governments with regard to non-housing community development needs; agencies with metropolitan-wide planning responsibilities; and the local public housing authority.

Consultation with Leon County, the only adjacent unit of government, is accomplished through routine meetings throughout the year as well as a joint process to award the CDBG used for public services and other funds received through United Way or other sources. Additionally, the City has a number of advisory

boards that provide feedback regarding housing and human service needs. There is an Affordable Housing Advisory Board that produces a triennial report and provides valuable feedback regarding housing policies, ordinances, etc. that may hinder the production of affordable housing.

The City supports the lead agency of the Continuum of Care (CoC) and regularly meets with that agency especially as it relates to the Emergency Solutions Group and homelessness issues. The lead agency of the CoC and member agencies meet monthly. City Staff attends those meeting to share information and to encourage and receive feedback. In addition to the notices identified in the *Notices, Times, and Locations of Meetings* section of this document, notices of public meetings and hearings are disbursed through the lead agency of the CoC and as many other networks as possible to encourage participation in the meetings and hearings.

Although the City does not administer public housing, it encourages participation from the Tallahassee Housing Authority and its residents as well as from agencies that provide special needs housing and human services to provide input relative to community needs and improvements. The City provides timely notification as well as appropriate information concerning these meetings to encourage such participation.

Required consultations include public and private agencies that provide assisted housing, health and human services, and fair housing services for children, veterans, youth, elderly persons with disabilities, persons living with HIV/AIDS, and their families. This is accomplished through constant contact and consultation with the CoC) and the lead agency CoC network meetings.

Provision of Technical Assistance

The City works with non-profits and interested parties to provide guidance and interpretation of relevant federal regulations, strategies, and objectives of the Consolidated Plan. The City will refer these agencies to other agencies or other organizations, if necessary. This assistance may come in the form of individual technical assistance at the request of an organization, staff attendance at meetings to provide direct technical assistance, or through responses to verbal questions or concerns at meetings.

Displacement

The City makes every effort to minimize relocation and displacement of persons, families, and businesses in activities funded by HUD funds. It will carry out its activities in accordance with the Uniform Relocation Act of 1970, as amended, the applicable federal regulations (49 CFR Part 24), and the requirements of the Section 104(3) of Title 1 of the Housing and Community Development Act of 1974, as amended.

When health and safety concerns are an issue, the City will make efforts to resolve the issues by helping property owners to bring properties up to local codes, removing substandard housing, or recommending temporary or permanent displacement of persons residing in the substandard units. In such events, the City will provide relocation assistance to the extent permitted, to families displaced as a direct result of programs funded by HUD programs.

However, there are times in areas such as targeted districts when the City may carry out revitalization efforts aimed at removing urban blight or to foster redevelopment. These initiatives may sometimes require relocation. In those cases, the City will notify all affected residents of the action which may cause

displacement as well as the benefits that will be available to all persons impacted as provided in 42 U.S.C. 4601 AND 5304(d), and 49 24 CFR 24 as amended, and all applicable state laws.

PUBLIC HEARINGS & COMMENTS ON PLANS & AMENDMENTS

First Public Hearing

Before developing the Consolidated Plan (or Substantial Amendment such as the Annual Action Plan), the City will hold at least one public hearing to:

- report on the accomplishments of the previous fiscal year
- allow citizens to make comments on what was accomplished and suggest priorities for future activities, thereby providing City staff with an indication of needs and activities that should receive emphasis in the development of the next Annual Action Plan;
- discuss the funding the City expects to receive from HUD as well as any anticipated program income and funds to be reprogrammed and the amount of this funding anticipated to benefit low and moderate income persons and households
- examine the range of eligible activities
- discuss CoC priorities with regard to ESG or other funding

Or in the case of a substantial amendment:

- explain the need for the substantial amendment
- provide information as to how the funds became available
- examine the eligible uses of available funds
- allow comment on the proposed use of the funds or change in use of the funds

Development of the Consolidated Plan (or Substantial Amendment)

After development of the Consolidated Plan or Substantial Amendment, the City provides a minimum of 30 days for comments prior to submission to HUD.

The City will use the following criteria to determine if a change to the Consolidated Plan is considered a "Substantial Amendment":

- Federal funds are proposed for an activity not previously described in the plan
- Changes are proposed for the use of CDBG funds from one eligible activity to another [24 CFR.105(c)(1)] if such change exceeds 25% of the total allocation of the City for the year

Second Public Hearing

A minimum of one additional public hearing is held after the proposed plan is published for public comment. This public hearing is held during a regular City Commission meeting, providing citizens an opportunity to present comments to the City's highest level of authority.

CONSOLIDATED ANNUAL EVALUATION AND PERFORMANCE REPORTS

The City's CAPER is due by December 29 of each year.

Citizen Input

The City will publish a notice on its official website and in the local newspaper of general circulation that the CAPER is available for comment, the purpose of the CAPER, how and where it can be accessed, and how comments may be submitted. Additionally, the CAPER is reviewed and the City's performance discussed in conjunction with the first public hearing held prior to development of the Annual Action Plan or Consolidated Plan process. The City's official website will be used to make the draft CAPER available for review and allow access of the document electronically.

The comment period for the CAPER is a minimum of 15 days to submission to HUD. Notice is published in the local newspaper of general circulation and placed on the City's official website (talgov.com). Notice includes how to access the CAPER as well as instructions on submission of comments.

A reasonable number of printed copies will be available at no cost upon request during this time as well as after submission of the document to HUD and notice of acceptance by HUD when the final document will be made available.

CITIZEN PARTICIPATION PLAN (CPP)

The substantial revisions to the CPP will be available for public comment for a minimum of 14 days through the City's official website (talgov.com). The City will publish a notice that includes the same information as provided in the section identified as *Notice, Time, and Location of Meetings*. However, the CPP will be available no later than the day after the notice is placed in the newspaper. A reasonable number of printed copies will be available at no cost upon request during this time. The final document, as amended, will be public and available on the official website of the City or available upon request in printed form.

Determination of a Substantial Amendment to the CPP

The City will consider the following as significant material changes that will require a substantial revision to the CPP

- HUD's written notification specifying a significant material change that requires an amendment
- timelines for public hearings, comment periods, or other notice or review periods are decreased

ASSESSMENT OF FAIR HOUSING (AFH)

First Public Meeting

Before developing the AFH, the City will hold at least one public hearing to obtain the views of residents of the community on AFH-related data and affirmatively furthering fair housing in the City's housing and community development programs.

Determination of a Substantial Revision to the AFH

The City will consider the following as significant material changes in circumstances that will require a substantial revision to the AFH:

- presidentially declared disasters that significantly impact the steps a program participant may need to take to affirmatively further fair
- significant demographic changes, including a change in population of more than 10%
- significant policy changes that include those that result from the adoption of an updated comprehensive plan or land use policy if they affect the information on which the AHF was based such that the AHF no longer reflects actual circumstances
- significant civil rights findings, determinations, or other legal settlement where the City is a party
- HUD's written notification specifying a significant material change that requires an amendment.

ALL COMPLAINTS AND COMMENTS

All comments will be considered whether received in writing or orally. A summary of these comments or views and those not accepted with the reasons why will be submitted to HUD with the final document.

The City will respond to complaints received from the public with regard to the consolidated plan, substantial amendments, AFH, AFH substantial revisions, and the CAPER in writing within 15 working days, where practicable.