

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 Analysis of Impediments to Fair Housing (which may be replaced by an Assessment of Fair Housing as defined in the statute but which has not yet been implemented by HUD).

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.

Analysis of Impediments to Fair Housing – This is an assessment done in connection with the jurisdiction's 5- year Consolidated Plan. 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.

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 following:

- Development of the Consolidated Plan, Annual Action Plan, CAPER, and Analysis of Impediments to Fair Housing;
- Development of any substantial or material amendments to those plans or reports;
or
- A substantial amendment 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

1. Notices for meetings and workshops associated with the development of or substantial amendment to the Consolidated Plan, Annual Action Plan or Analysis of Impediments, will be placed in the local newspaper of general circulation and social media platforms in the days leading up to the event, 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.

2. Public meetings will be held at times and locations convenient to potential and actual beneficiaries. Generally, every attempt is made to hold meetings 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 is held in conjunction with the City Commission meeting at an accessible, central location.

3. In the event of a state or federally declared disaster, pandemic, or other major event, the City reserves the right to waive these participation guidelines. At no time will any waiver of these guidelines be in conflict with the governing statutes. The City may implement one or more of the following measures:

- Virtual meetings that allow citizens to participate via an online format may be utilized in the event in-person meetings are not feasible or allowable;
- The City may limit the availability of documents to online or in hard copy by request only; and
- The publication notice for public hearings may be shortened from 30-days prior to 5-

days prior to the scheduled public hearing.

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 electronically. 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 access at all times to information and records relating to the Analysis of Impediments, Consolidated Plan, Annual Action Plan, CAPER, and any substantial amendments to programs which are subject to this Citizen Participation Plan for as much as the preceding five years. These reports, public notices, and program descriptions are available on the City's webpage at www.talgov.com. In addition, a reasonable number of printed copies will be available upon request.

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. 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. Consultations also include those with other local governments, the local Continuum of Care agency, the local housing authority, and other neighborhood and community stakeholder groups. Consultations shall also include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies in the process of developing the consolidated plan.

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 all applicable state laws.

REQUIRED REPORTS AND PLANS – PUBLIC ACCESS, HEARINGS AND MEETINGS

General Information

1. All reports and plans are available electronically via the City's official website. Upon request, accommodations may be made for alternative forms of review.
2. All public meetings and hearings will be held in places easily accessible and open to the general public.
3. In the event of a state or federally declared disaster, pandemic, or other major events, the City reserves the right to waive these participation guidelines. At no time will any waiver of these guidelines be in conflict with the governing statutes.

Consolidated Plan

1. During development of the City's 5-Year Consolidated Plan, the City will hold at least one public meeting 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;
 - 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;
- allow for input on community needs;
- update citizens on the City's Analysis of Impediments to Fair Housing and seek comments on issues affecting fair housing; and
- Collect comments, suggestions, and other input regarding the City's use of funding for the term of the Consolidated Plan.

2. The City will hold at least one public hearing in conjunction with seeking approval by the City Commission prior to finalizing the Consolidated Plan. 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.

3. The City will publish the draft/proposed Consolidated Plan providing for 30 days public comment period prior to submission of the Plan to HUD.

Annual Action Plan

1. During development of the Annual Action Plan, the City will hold at least one public meeting 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; and
- discuss CoC priorities with regard to ESG or other funding.

2. The City will hold at least one public hearing in conjunction with seeking approval by the City Commission prior to finalizing the Annual Action Plan. 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.

3. The City will publish the draft/proposed Annual Action Plan providing for 30 days public comment period prior to submission of the Plan to HUD.

Substantial Amendments

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

- Federal funds are proposed for an activity not previously included or described in the plan; or
- Additional federal funds are received; or
- Changes are proposed for the use of CDBG funds from one eligible activity to

another [24 CFR 91.105(c)(1)] if such change exceeds 50% of the total allocation to the City for the year.

2. During development of a Substantial Amendment to the Consolidated or Annual Action Plan, the City will hold one public hearing to:

- explain the need for the substantial amendment;
- provide information as to how the funds became available;
- examine the eligible uses of available funds; and
- allow comment on the proposed use of the funds or change in use of the funds; and
- seek approval by the City Commission prior to finalizing the Substantial Amendment. 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.

3. The City will publish the draft/proposed Substantial Amendment providing for 30 days public comment period prior to submission of the Plan to HUD.

Consolidated Annual Evaluation and Performance Report (CAPER)

1. The City's CAPER is due by December 29 of each year, unless the due date is waived or extended by HUD.

2. Once City staff have generated the draft CAPER, the City will provide a minimum of 15 days public comment period prior to submission to HUD. Notice is published in the local newspaper of general circulation and placed on the City's official website. The notice includes how to access the CAPER as well as instructions on submission of comments.

3. After submission of the CAPER and prior to the development of the Consolidated or Annual Action Plan, the CAPER is reviewed, and the City's performance discussed in conjunction with the first public hearing.

Citizen Participation Plan

1. This Citizen Participation Plan (CPP) is effective from the date of approval by HUD and approved by the City Commission.

2. The City will follow the standards set forth in the CPP in carrying out its regularly scheduled activities and programs.

3. 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; or
- Timelines for public hearings, comment periods, or other notice or review periods are decreased, such as during a disaster, pandemic or other major event.

4. The substantial revisions to the CPP will be available for public comment for a minimum of 5 days through the City's official website. The City will publish a notice that includes the same information as provided in the section identified as *Notice, Time, and Location of Meetings*. The final document, as amended, will be public and available on the official website of the City or available upon request in printed form.

Analysis of Impediments to Fair Housing

1. During the development of the City's 5-Year Consolidated Plan and Annual Action Plan, the City will review the most recent Analysis of Impediments to Fair Housing for revisions.

2. In conjunction with the public meeting for the Consolidated Plan, the City will inform citizens of the City's Analysis of Impediments and request comments on issues affecting fair housing.

3. Annually, in conjunction with the Annual Action Plan, the City will determine if any additional impediments need to be added or if changes should be made prior to submitting the Annual Action Plan to HUD.

4. The City will publish the Analysis of Impediments, if amended, in conjunction with the notice of comment period for the Consolidated Plan or Annual Action Plan, providing 30 days public comment period prior to submission to HUD.

5. This section will be amended to address the Assessment of Fair Housing (AFH) which replaces the Analysis of Impediments when implemented by HUD.

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, the CAPER, and Analysis of Impediments in writing within 15 working days where possible.