

CITY OF CHATTANOOGA

CITIZEN PARTICIPATION PLAN



CITIZEN PARTICIPATION PLAN

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CITIZEN PARTICIPATION PLAN REVISIONS

As of September 1, 2020, this Citizen Participation Plan has been revised to include the following:

- Virtual or web-based hearings as an allowed method for citizen participation;
- Updates to the types of declared disasters or emergency events such as terrorism or infectious diseases (i.e. the recent Coronavirus 19/COVID-19 pandemic) that may necessitate accelerated substantial amendments;
- Details on proposed actions that may be undertaken to respond to “urgent needs”, resulting from disasters or emergency events; including the reprogramming of funding and types of possible activities;
- Provisions for waivers relative to “Consolidated Plan” citizen participation, the Community Development Block Grant, and the Emergency Solutions Grant;

I. INTRODUCTION

The following Citizen Participation Plan (CPP) provides a framework and process by which the City's consolidated planning efforts comply with the citizen participation requirements of the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations *24 CFR Part 91.105*. The City of Chattanooga Department of Economic and Community Development (ECD) is responsible for developing and implementing the Citizen Participation Plan along with other plans and reports required by HUD.

The City of Chattanooga receives annual grant funding from HUD's Community Planning and Development (CPD) Office consisting of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG). The City's Citizen Participation Plan serves as a guide to encourage participation in the decision-making processes, input processes, identifying housing, community development and public service needs, and in setting the funding priorities for programs and target populations to be served through these resources. Particular emphasis is placed on the participation of low – and moderate-income residents for whom the funds are proposed to be used.

The Citizen Participation Plan is designed to outline how the City will:

- Gather input from persons with low and moderate incomes, persons living in slum and blighted areas, and/or in areas where funds are being used or proposed to be used, and from residents of primarily low and moderate income neighborhoods, where at least 51% of the residents are low and moderate income persons;
- Seek input from persons who are homeless, members of minority groups, non-English speaking persons, persons with disabilities, residents of public housing, elderly, local and regional organizations and institutions, as well as the Continuum of Care;
- Provide citizens with reasonable and timely access to meetings, information, and records relating to the proposed use of funds, contents and purpose of the Consolidated Plan;
- Provide technical assistance to groups representative of citizens of low and moderate income that request such assistance in developing proposals;
- Provide for public hearings to obtain citizen input and to respond to proposals and questions at all stages of the Consolidated Plan, the development of needs, review of proposed activities, and review of program performance standards;
- Provide for hearings to be held after adequate notice, (a minimum of ten (10) working days), at times and locations convenient to potential and actual beneficiaries, and at accessible venues where accommodations for persons with disabilities can be provided;
- Where applicable, identify how the needs on non-English speaking residents will be met in the case of public meetings; and

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- Provide for a formal written procedure which will accommodate a timely written response, (within fifteen (15) days where practicable), to written complaints and grievances.

The CPP outlines how citizens will be afforded opportunities to participate in processes relative to developing and or implementing the following:

- Five-Year Consolidated Plan
- Annual Action Plan
- Substantial Amendments to the Consolidated Plan or its five Annual Action Plans
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Analysis of Impediments
- Environmental Review Process

Five-Year Consolidated Plan – The Consolidated Plan is a five-year plan to examine the housing and community development needs for the community and outlines anticipated strategies to address those needs.

Annual Action Plan - The Action Plan is an annual plan that describes-in detail how the Citizen Participation Plan sets forth the City’s policies and procedures for citizen participation in developing the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the performance reports. It is the policy of the City to ensure citizen involvement throughout all of these processes.

Consolidated Annual Performance and Evaluation Report – The CAPER is an annual report to evaluate progress toward the goals established in the Consolidated Plan.

Analysis of Impediments – The City of Chattanooga is required to conduct an Analysis of Impediments to Fair Housing Choice, or AI, every five years as a condition of receiving federal block grants funds for housing and community development. The AI analyzes the barriers to fair housing choice, including intentional actions, and unintended consequences of public and private market forces that limit housing opportunities for individuals and families based on protected classes.

Environmental Review Process - An environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment nor have an adverse environmental or health effect on end-users.

II. PARTICIPATION

The primary purposes of programs covered by this Citizen Participation Plan are to improve communities by providing decent housing, a suitable living environment, and growing economic opportunities – all principally for low and moderate income people. Participation will be sought for needs identification, priority setting, funding

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allocations, program recommendations related to the consolidated planning process, and comments on the environmental review process.

In order to encourage and support public participation, the City will provide information, hold public hearings, and give citizens the opportunity to participate and comment. Public hearing refers to both public hearings, including virtual or web-based hearings, and community meetings for purposes of this Citizen Participation Plan. All phases of citizen participation will be conducted in an open and transparent manner, with freedom of access to all interested citizens. Public hearings will be advertised and pertinent information will be available to the public. Citizens will be provided with reasonable and timely access to these public meetings.

The City will also consult with focus groups (i.e. for profit and nonprofit organizations, businesses, developers, community and faith based organizations, philanthropic organizations, local and regional institutions and the Continuum of Care) that represent and/or serve these populations.

To further encourage and provide citizens opportunities to participate in the planning, public participation, and performance evaluation processes, the Community Development Advisory Committee (CDAC) was created. The role of the CDAC is to provide citizen participation in funding and program recommendations, and the review and evaluation of the City's Community Development Program. The CDAC also assists in providing citizen input in the development of the City's Consolidated Plan process, the assessment of community needs, and informing other citizens about the CDBG, ESG, HOME, and relative programs.

The CDAC will consist of nineteen (19) individuals; nine (9) City Council District Representatives, chosen by the city council member of the representative's district, and ten (10) citizens at-large, chosen by the Mayor.

To the greatest extent feasible, the City ensures CDAC members are from any of the following groups or are representatives of agencies or government departments with relative interests and/or expertise:

- Low- and moderate-income persons
- Residents of slums, blighted areas, and predominately low-and moderate-income census tracts
- Non-English speaking persons
- Persons with disabilities
- Public housing residents
- Low-income residents of targeted revitalization areas
- Individuals served by private agencies that provide assisted housing, health services, and fair housing services for children, veterans, youth, elderly, persons with disabilities, persons living with HIV/AIDS, and their families, focus groups (i.e. for profit and nonprofit organizations, businesses, developers, community and faith based organizations, philanthropic organizations, local and regional institutions and the Continuum of Care)

III. PUBLIC HEARINGS, MEETINGS and NOTICES

The City will hold at least two (2) public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the City's CPD-funded programs.

The hearings will be conducted at two different stages in the program year. At least one hearing will be held prior to the adoption of the proposed Consolidated Plan and/or annual One-Year Action Plan (March through April). The second public hearing will be conducted later in the year and will focus on the results reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER).

Every five years, in preparation for the Consolidated Plan, the City will hold additional public meetings before the proposed Consolidated Plan is published for review. The purpose of the meetings will be to obtain input on housing and community development needs.

All hearings and meetings will be held at times and locations convenient to potential and actual beneficiaries, with reasonable accommodations for persons with disabilities. The City will make reasonable efforts to accommodate persons with special needs who notify the City at least three (3) business days prior to the public meeting. Upon request from non-English speaking citizens, efforts will be made to have a person fluent in the respective language present at these meetings.

In the event that national or local health officials recommend social distancing and/or limited public gatherings for public health reasons, virtual or web-based hearings will be used in lieu of in-person hearings. If this format is used accommodations for real-time responses, timely responses from local officials to all citizen questions and issues, public access to all questions and response, and accommodations for persons with disabilities or limited English proficiency will be made to the greatest extent possible.

The hearings generally address housing, social, and community development needs, proposed activities, and the review of program performance. On the day of the public hearing, comments may be submitted in writing or made orally during the hearing.

Public Notice

Notices informing citizens of any public hearings/meetings related to Consolidated Plan, Annual Plan, substantial amendments to the Consolidated Plan and Annual Plan and CAPER activities will be provided a minimum of fourteen (14) calendar days before the public hearing date. The notices will provide details concerning the nature and format of the public hearing, applicable HUD regulations, date and time of the hearings, and any other pertinent information.

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The City posts notices on the City's websites at <http://www.chattanooga.gov/economic-community-development> and <http://www.chattanooga.gov/city-council/public-notices> (when applicable), and publishes notices in the local newspaper of general circulation – Chattanooga Times Free Press. Whenever feasible, the City also utilizes other mediums of communication targeted to non-English speaking citizens and minority groups, like newspapers, newsletters, radio, community bulletin boards, and websites to announce the schedule of meetings.

Additionally, citizens can be notified via e-mail, posted fliers, brochures, new releases, public service announcements, feature stories, postings in: various departments within the City of Chattanooga, offices of subrecipients or program partners, public health facilities that have MOU's with the City of Chattanooga, and by staff attending local events, workshops, or meetings.

Notices announcing the availability of the draft Five-Year Consolidated Plan, draft annual Action Plan, or Consolidated Annual Performance Evaluation Report for review and public comment will include: the public meeting date, a summary of the proposed plan/report, information on where copies of the particular plan/report will be available, and the length of time. Copies will always be available on the Community Development Division website and at the following locations.

City of Chattanooga
Community Development Division
101 E. 11th Street, Suite 200
Chattanooga, TN 37402

Chattanooga Housing Authority
801 N. Holtzclaw Avenue
Chattanooga, TN 37404

Notices Not Involving Public Meetings

For notices of actions not requiring public hearings or meetings, such as substantial amendments to the Consolidated Plan, or the Action Plans, and notices for environmental reviews, the City will publish and release the information through mediums indicated. The public will be afforded the applicable public comment period (based on the action being proposed), in which to review and provide comments.

Notices During Disasters or Emergencies

In the event of certain disasters or emergencies HUD may provide waivers and or alternative requirements relative to public notification processes. In such events, the City will avail itself of any provided that will help in expediting notifications for the delivery of assistance to the community.

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Meeting the Needs of Non-English Speaking Persons

The City makes every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

For local Citizen Participation meetings and other program-related public events, language translators can be provided for non-English speaking populations with a minimum three (3) days' notice. Meeting materials can be made available in other languages, upon request.

Throughout the City of Chattanooga, there are significant populations of Spanish-speaking persons residing in the very low, low, and moderate-income neighborhoods. The City posts English and Spanish translated versions of meeting notices on the City's website at <http://www.chattanooga.gov/economic-community-development/community-development>. Whenever feasible, the City also utilizes other mediums of communication targeted to Spanish-speaking citizens, like newspapers, newsletters, community bulletin boards, and websites to announce the schedule of meetings.

Spanish translations of, summaries from the Consolidated Plan, Action Plan, CAPER, and substantial amendments will be available on the City's website, and in the Community Development Division for citizen review.

Access for Persons with Disabilities

The City is committed to providing equal access in its programs, services, and activities for persons with disabilities. Special accommodations or materials in alternative format, under the Americans with Disabilities Act, are available upon request. In addition, accommodations will be made, upon request, for attendees who are either visually or hearing impaired. Requests must be made at least three (3) days prior to meeting. Later requests will be accommodated to the extent feasible.

V. AVAILABILITY/ACCESS TO INFORMATION

The City will provide opportunities for residents, public agencies, and other interested parties, including those most affected, with reasonable and timely access to information and records relating to the use of these funds. Information and records for the past five (5) years are on file at the Community Development Division.

Standard documents will be available for public review on the City's website at all times, and at the Department of Economic and Community Development at the location below, Monday through Friday, from 8:30 a.m. until 4:00p.m.

Standard program documents that shall be made accessible for public review include the current Consolidated Plan and related, Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER); Substantial Amendments; and this Citizen

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Participation Plan. These materials will also be available in a form accessible to persons with disabilities, upon request.

Department of Economic and Community Development
101 E. 11th Street, Suite 200
Chattanooga, TN 37402
(423) 643-7330

City of Chattanooga's website: <http://www.chattanooga.gov/economic-community-development>

Copies may be requested in person, by mail, email, or by telephone. Program records maintained on file, or requiring research and compilation, shall be provided within a reasonable time period upon receipt of a written request, which specifically states the information desired.

This paragraph is not intended to supersede the provisions of the Freedom of Information Act of 1966, as amended, which covers all programs and activities in the Consolidated Plan.

VI. PUBLIC COMMENTS

It is the policy of the City to provide residents, service providers, government agencies, and other stakeholders a sufficient time period to review and comment on the proposed Consolidated Plan, Annual Action Plans, and substantial amendments.

When any draft plan or report is complete or a substantial amendment is proposed, the availability for public review and comment will be publicly announced along with date(s) of public meeting(s). Notification(s) will be provided as outlined under the "Public Notices" section.

All public notices advise interested persons of the process to submit comments and obtain additional information regarding the proposed action(s). The City of Chattanooga will consider any comments received during the below public comment period and make modifications, if appropriate, in response to the comments, before it completes, adopts or submits the information to HUD, as applicable.

A summary of all comments or views of citizens received in writing, or orally at public hearings, along with a summary of any comments not accepted reasons thereof, will be attached and made a part of the corresponding document.

The City provides citizens timely opportunities to review and submit comments on the Consolidated Plan, Action Plans, substantial amendments, and performance reports as follows:

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Consolidated Plan & Annual Action Plans	30 days
Substantial Amendments	30 days
Annual Performance Reports	15 days
Special Waivers/Flexibilities	5 days

Comments can be made in person or in writing to:
Manager of Community Development
Department of Economic and Community Development
101 E. 11th Street
City Hall, Suite 200
Chattanooga, TN 37402

Or emailed to: comdev@chattanooga.gov

In person: Monday through Friday, from 8:30 a.m. until 4:00p.m.

VII. DEVELOPMENT OF THE CONSOLIDATED PLAN

The Consolidated Plan is a five-year strategic plan. This document serves as the planning document of the City in order to apply for funding under the CDBG, HOME, and ESG programs. Through this document, the City identifies needs and goals for community planning development, and housing programs during the designated five-year period. The plan is submitted to HUD on or before May 15* prior to the start of the first year of the new five-year period.

In order to ensure citizen participation, the City of Chattanooga will host various focus groups prior to the development of the Five-Year Consolidated Plan. The City will also conduct at least one public hearing before the proposed Consolidated Plan is published for comment. Before the City adopts the proposed Consolidated Plan, the City will provide citizens, public agencies, and other interested parties with the following:

1. A forum for citizens and groups to provide the City with information on housing and community development needs as part of the preparation of the Consolidated Plan;
2. The amount of funds the City expects to receive from HUD for the implementation of the CDBG, HOME, and ESG programs, including program income received through activities under these programs;
3. The range of activities that may be undertaken under each of these programs and the estimated amount of funds that will be available to benefit low and moderate income residents;
4. The City's plans to minimize displacement of persons and to assist any persons displaced, along with the types and levels of assistance that will be made available

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(or require others to make available) to persons displaced, even if the City expects no displacement to occur.

The City will publish notification of the availability of the proposed Consolidated Plan in accordance with the “Public Notices” section above. The notification will include a summary of the proposed Consolidated Plan. Citizens will be given the opportunity to comment on the proposed Consolidated Plan for a period of not less than thirty (30) days before the Consolidated Plan is approved by City Council and submitted to HUD.

Annual Action Plan

Prior to submitting to HUD the Annual Action Plan outlining specific projects and the use of funds, the City follows the process described below:

- Hold public meeting(s) to provide the public information on the estimated amount of CDBG, HOME, and ESG funds to be received in the upcoming year, along with a description of the range of types of activities that may be undertaken and receive input on activities/proposed activities to address community needs;
- Identify activities consistent with achieving outcomes established in Consolidated Plan;
- Publish the draft of the Action Plan to provide opportunity for public review and comment (the City may modify the Action Plan after considering public comment, as appropriate);
- Present to Mayor and City Council for approval.

*In the occurrence of certain disasters, emergencies or other unanticipated events, the City may request extensions on the submission of the Consolidated Plan and Action Plan.

VIII. ANNUAL PERFORMANCE REPORT (CAPER)

Within 90 days after the close of the City’s fiscal year (September 30th), HUD regulations require the City to submit a performance report - the Consolidated Annual Performance and Evaluation Report (CAPER). Principally, the CAPER provides information on how the federal funds were spent and the extent to which they were used for activities that benefited low and moderated income citizens.

The CAPER also provides HUD with information to assess whether the City carried out its programs in compliance with applicable regulations and requirements, as stated in that year’s plan. Additionally, the CAPER is a vehicle through which the City can describe its program achievements to local citizens.

As outlined in the “Public Comments” section above, at least fifteen (15) days prior to submission to HUD, the CAPER is made available to the public for review and comment. Notice and availability of the CAPER for review and comment is published.

IX. AMENDMENTS AND ADMINISTRATIVE UPDATES

From time-to-time, it may be necessary for the City to process a “substantial amendment” to the Five-Year Consolidated Plan or the One-Year Action Plans to allow for new CDBG, ESG, or HOME-funded activities; modification of existing activities; or other CPD program administrative actions. In addition, off-cycle activity planning may occur outside of the annual planning process. In these instances, actions to modify or significantly change a city’s program are considered to be “off-cycle” changes, and by definition, are categorized as Substantial Amendments.

Substantial Amendments

Any proposed amendment that is considered a “Substantial Amendment” is subject to the citizen participation process, requires formal action by City Council, and approval by HUD. A thirty (30) day public notice is published to provide the opportunity for the public to review and comment on the proposed substantial amendment(s).

A change in federal rules or regulations that mandates an alteration in current programming operations would not be considered a substantial amendment, but rather a conforming regulatory requirement.

Federal regulations at 24 CFR 91.105(c)(1), require the inclusion of specific criteria in the Citizen Participation Plan for determining what constitutes a change in programming activities significant enough to be classified as a “Substantial Amendment” to the Consolidated Plan.

The City’s criteria for Substantial Amendment:

- A change in which the total grant award for an entitlement program increases or decreases by more than 50% during the program year.
- To carry out an activity that was not previously identified in the plan.
- A change in purpose, priority, scope, location, funding, or beneficiaries from one eligible activity to another by more than 50% of total previously authorized.

The City will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105 (c)(3). A summary of these comments and views, including comments or views not accepted (with reason) shall be attached to the Substantial Amendment. The City will submit Substantial Amendments to HUD on an annual basis.

Disasters, Emergency Events, and Urgent Needs

In the event of a declared disaster or emergency, it may be necessary to expedite substantial amendments to the Consolidated Plan. These amendments may include funding new activities and/or the reprogramming of funds, including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the City may utilize CDBG, HOME, or ESG funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period (otherwise required for substantial amendments).

With respect to a declared disaster or emergency event, the City may elect to use CDBG, HOME, or ESG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG, HOME, or ESG-eligible use. HUD may provide new guidance on eligible uses in which the City will comply with and may utilize as well.

Urgent Needs

To comply with the “Urgent Needs” National Objective, activities undertaken in response to disaster or emergency events will meet community development needs having particular urgency. These activities will alleviate existing conditions that the City certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;*
- Are unable to be financed by the City on its own;** and
- Other resources of funding are not available to carry out the activity.

*A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City’s certification.

**If HUD allows, activities under Urgent Needs to be funded without the requirement that the participating jurisdiction is unable to finance the activity on its own and with no other resources available to carry out the activity, the City will only certify that the activity poses a serious and immediate threat to the health and welfare of the community. Therefore, it is of recent origin or recently became urgent.

Activities to address “Urgent Needs” include, but are not limited to the following:

- Clearance of debris;
- Provision of extra security patrols;
- Demolition, clearance and/or reconstruction of damaged property posing an immediate threat to public safety;

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- Emergency reconstruction of essential water, sewer, electrical, medical, and telephone facilities;
- Emergency repair of streets and sidewalks; and
- Providing a variety of relief services to individuals.

Non-Substantial/Standard Amendments

In addition to Substantial Amendments, federal regulations require the City to amend the Consolidated Plan when any of the following amendments are made:

- Updates to Consolidated Plan data including, but not limited to, census data, income limits, fair market rents, and HOME high/low market rents.
- Change in location of implementing an approved activity so long as the purpose, scope, and intended beneficiaries remain constant.
- Transfer of entitlement funds amongst program years' budget lines for synonymous activities.

Non-substantial/standard amendments will be approved on an administrative basis by the City Administrator responsible for oversight management of the City's CPD funds. Non-substantial/standard amendments and administrative updates are not formally noticed to the public, nor submitted to HUD. However, documentation describing general changes and/or identifying specific changes will be included in the annual Consolidated Annual Performance and Evaluation Report (CAPER), which is made available to the public.

In an effort to efficiently utilize CDBG/HOME/ESG funds, the City will consider the reprogramming of unspent CDBG/HOME/ESG balances from completed and cancelled CDBG/HOME/ESG-funded activities to other eligible activities. In the event that any of these "administrative" reprogramming actions fall under the "Substantial Amendment" criteria, the proposed actions are subject to the Citizen Participation process, requires formal action by City Council, and approval by HUD.

Substantial and Non-substantial amendments, over \$25,000.00, increasing, decreasing, creating new budget line items through funding of new or deleting of previously funded activities require City Council approval through the formal public council process.

Administrative Updates

Changes to the Consolidated Plan that do not require citizen participation and do not meet the criteria for Substantial or Non-Substantial/Standard Amendments are defined as "Administrative Updates." Examples of these updates include grammatical or structural edits that do not substantially change the scope or meaning of the activity, as well as changes in the coding or eligibility determination of a project that do not change the scope, location, or beneficiaries.

X. ENVIRONMENTAL REVIEW PROCESS

An environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment, and the property site itself will not have an adverse environmental or health effect on end-users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws. As part of this process, public notification and solicitation of comments may be required.

Environmental review records for all funded projects are maintained on file at the Department of Economic and Community Development, 101 E. 11th Street, City Hall Suite 200, Chattanooga, TN 37402, and may be viewed by the public between the hours of 8:00 am and 4:00 pm.

Dissemination and/or Publication of the Findings of No Significant Impact

If the City of Chattanooga makes a “finding of no significant impact,” it will prepare a Notice of Finding of No Significant Impact (FONSI). This FONSI notice will be disseminated through a number of communication vehicles to individuals and groups known to be interested in the activities, to any appropriate tribal, local, State and Federal agencies, to the Regional Office(s) of the Environmental Protection Agency having jurisdiction, and to the HUD Field Office (or the State where applicable). There is an expectation that the City of Chattanooga will publish the FONSI notice in any newspaper of general circulation in the affected community. However, if the notice is not published, it will be prominently displayed in City Hall, other municipal buildings, local community libraries, and community centers located near the project area, and may be published on the City's website or social media.

The City of Chattanooga may disseminate or publish a FONSI notice at the same time it disseminates or publishes the Notice of Intent to Request Release of Funds (NOI-RROF) as required by 24 CFR §58.70. If the notices are released as a combined notice, the combined notice shall:

- Clearly indicate that it is intended to meet two separate procedural requirements; and
- Advise the public to specify in their comments which “notice” their comments address.

The City of Chattanooga will consider any comments received during the below public comment period and make modifications, if appropriate, in response to the comments, before it completes its environmental certification and submits the RROF to HUD.

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Public Comment Period- Environmental Review

Required notices must afford the public the following minimum comment periods, counted in calendar days:

Notice of Finding of No Significant Impact	15 days when published, or, if no publication, 18 days when mailing and posting
Notice of Intent to Request Release of Funds	7 days when published, or, if no publication, 10 days when mailing or posting.
Concurrent or Combined Notices	15 days when published, or if no publication, 18 days when mailing and posting.

Comments related to environmental reviews must be submitted to:

Manager of Community Development
Department of Economic and Community Development
101 E. 11th Street
City Hall, Suite 200
Chattanooga, TN 37402

Monday through Friday, from 8:30 a.m. until 4:00p.m.
Or emailed to: comdev@chattanooga.gov

XI. ANTI-DISPLACEMENT

In implementing the Consolidated Plan, the City of Chattanooga will comply with all requirements of the Uniform Relocation Assistance Act (URA). The URA's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.

The City will review all projects recommended for funding to identify those activities that may result in the displacement of residents and make every effort to minimize such displacement. When displacement cannot be avoided the City will take the needed steps to assure that the objectives of the URA are achieved. The URA objectives are as follows:

- To provide uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects,

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- To ensure relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement,
- To ensure that no individual or family is displaced unless decent, safe, and sanitary (DSS) housing is available within the displaced person's financial means,
- To help improve the housing conditions of displaced persons living in substandard housing, and
- To encourage and expedite acquisition by agreement and without coercion.

XII. TECHNICAL ASSISTANCE

All potential applicants for funding are encouraged to contact City staff for technical assistance in developing proposals for any program covered under the Consolidated Plan. The City's Office of Community Development staff will work with organizations or individuals representative of low and moderate income people who are interested in submitting a proposal to obtain funding for an activity.

Workshops are offered during the solicitation for applications and technical assistance is provided on an individual basis, upon request. A statement of the availability of the technical assistance service and scheduled work sessions is included in solicitations for proposals.

XIII. COMPLAINTS

Citizens with complaints concerning the Community Development Program, the Consolidated Plan, amendments, or Performance Reports should contact the Community Development Division of the Department of Economic and Community Development by calling (423) 643-3700 or in writing at:

City of Chattanooga
Department of Economic and Community Development
101 E. 11th Street, Suite 200
Chattanooga, TN 37402

City staff will provide a written response within 15 working days (when practicable) of the receipt of the complaint or grievance. If the complaint is unresolved at the local level, citizens will be provided information and instructions on their right to contact the U.S. Department of Housing and Urban Development. A record will be maintained of all complaints received that will include the nature of the complaint, referrals made, and the final disposition.

XIV. USE AND CHANGING THE CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan will be made public and followed by the City as presented. Upon request, the plan will also be available in a form accessible to persons with disabilities.

This plan may be changed from time to time to enhance clarity, enhance the process for encouraging constructive citizen participation, or to incorporate requirements, waivers, or flexibilities allowed by HUD or other federal entities. Some changes are considered substantial changes. Substantial changes consist of changes to comply with federal amendments.

When substantial changes are made to the CPP, a summary of the changes will be provided with the Annual Action Plan, Amended Action Plan, Consolidated Plan, or Amended Consolidated summary notice, allowing citizens a reasonable opportunity to comment. The entire document will be available with the Consolidated Plan and Action Plan. The amended CCP will be adopted following the thirty (30) day public comment period, or the applicable, shortened period allowed by HUD through special waivers or flexibilities.

Non-substantial changes or “administrative updates” to the plan are changes to enhance clarity or readability, to enhance the process for encouraging constructive citizen participation in the comprehensive planning, programming, goals, objectives and projects, or to address changes that are not being made to comply with federal amendments. Non-substantial changes are approved by the department administrator. The CPP will be updated to incorporate non-substantial changes. The updated CPP will be available with the Annual Action Plan on the City’s website.

XV. CITY’S RESPONSIBILITY

The Citizens Participation Plan does not restrict the responsibility or the authority of City officials in the development of annual applications for funding from the U.S. Department of Housing and Urban Development or in the execution of the Community Development Program. While citizen participation is essential for a viable program, the final authority for decision making rests with the Mayor and City Council. The Mayor is the grantee recipient, and the Department of Economic and Community Development serves as administrator of the programs.

The exchange of information among citizens, City staff, and elected officials provides for a stronger, more responsive housing and community development effort in the City of Chattanooga. The Community Development Division, in partnership with the Economic and Community Development Department’s neighborhood capacity-building initiatives, will continue to build capacity in neighborhoods for participation in the Community Development process.

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This Citizens Participation Plan supersedes and replaces all previous plans adopted or amended for the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG) programs.

XV. ROLE OF COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

The role of the Community Development Advisory Committee (CDAC) is to facilitate citizen participation and representation, by or on behalf of low- and moderate-income persons, particularly those living in slum and blighted areas where CPD and leveraging funds are proposed to be used, and those residents of predominantly low- and moderate-income neighborhoods.

The CDAC members provide for citizen input in the development of the City's Consolidated Plan process, assist in the assessment of community needs, inform other citizens of the CDBG, ESG, HOME programs, assist in identifying housing barriers, and developing community-based policy recommendations to address them. CDAC member responsibilities include, but are not limited to:

- On an as-needed basis, assist ECD staff in assessing requests and recommendations for funding under the CPD programs. Committee members' input will be included when recommendations are presented to Mayor and City Council for approval;
- Attend public meetings/forums to stay informed about CD operations;
- Be available on an as-needed basis when a sub-committee is required for input on funding decisions (selected members may vary depending upon the proposed activity);
- Provide input on possible uses of Community Development funds;
- Comment on the City's Consolidated Plan, Annual Performance Report, and amendments, as appropriate;
- Assist staff in marketing the City's community development and housing programs to the community; and
- Review the performance and effectiveness of the Community Development Programs.

The CDAC will consist of nineteen (19) members. This includes one resident from each of the City's nine (9) Council Districts, and ten (10) community representatives, consisting of residents from low income census tract or targeted neighborhoods, or representatives from agencies and departments with interests and/or expertise relative to community development objectives. The members are identified as follows:

Council Representatives (9)

One (1) representative from each of the nine (9) City Council Districts. Each City Council member will appoint a member to represent his or her district. The appointee must be a resident living in the respective council district.

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Community Representatives (10)

The Mayor will appoint a total of ten (10) representatives from the community. Appointees can be low- and moderate-income persons or representatives of entities whose interests and/or expertise relate to community development objectives.

Efforts will be taken to ensure the CDAC is diverse and, at minimum, fairly represents the following:

- Minorities,
- Low and moderate-income income persons,
- Low and moderate-income persons living in slum and blighted areas where funds are proposed to be used,
- Residents of predominately low and moderate-income neighborhoods,
- Non-English speaking persons,
- Persons with disabilities,
- Elderly,
- Residents of public and assisted housing developments,
- Local and regional institutions,
- Continuum of Care, and
- Other organizations (businesses, developers, nonprofit organizations, philanthropic organizations, or community-based and faith-based organizations)

CDAC members may serve a maximum of two (2) consecutive terms consisting of three (3) years per term. A rotation system based upon appointment date to the CDAC ensures membership of new and experienced members whether appointed by the Mayor or a Council Member.

Committee members are replaced on the CDAC, at the member's request, for absence from at least three (3) consecutive meetings, and by member rotation.

When a new Council Member is elected, the previous Council Member's representative serves on the Committee until their term expires; at that time, a new representative may be selected.

When a new Mayor is elected, the Mayor may only select the neighborhood representatives as the existing members' terms expire which may include re-appointments or new appointees.

The Advisory Committee will meet no less than two (2) times each year. Public meetings for Action Plans and CAPERs count as meetings. Additional meetings may be called if certain program changes occur. The Advisory Committee will meet to discuss and approve those changes. Committee members will be given at least ten (10) calendar days' written notice of all meetings. Decisions will be made by majority vote of those in attendance.