



COLUMBUS CONSOLIDATED GOVERNMENT

CITIZEN PARTICIPATION PLAN

RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &
DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT (HUD)

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A. Introduction

Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the Columbus Consolidated Government, hereinafter referred to as the "City", sets forth the following Citizen Participation Plan as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Citizen Participation Plan presents the City's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- The Citizen Participation Plan
- The Consolidated Plan (CP)
- The Annual Action Plan (AAP)
- The Consolidated Annual Performance and Evaluation Report (CAPER), and
- The Section 108 Loan Guarantee Program

Lead Agency

The Community Reinvestment Department is the lead agency responsible for the administration of the Community Development Block Grant Program (CDBG), including the Section 108 Loan Guarantee Program, the HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG).

Effective Date

Subsequent to approval of this Citizen Participation Plan by the City, the Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, and the CAPER. The City encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities.

To encourage these residents to participate in the development of the Assessment of Fair Housing and the Consolidated Plan, the City will undertake the following initiatives in addition to publishing advertisements in the *Columbus Ledger-Inquirer* for these activities:

- At least one stakeholder interview or focus group session will be scheduled during the stakeholder consultation processes for each and will focus on persons with limited English proficiency, and
- The City will provide a Spanish version of meeting agendas, handouts and surveys at meetings and stakeholder interviews conducted for each planning process.

Assessment of Language Needs

The City of Columbus Community Reinvestment Department has in place a Language Assistance Plan (LAP), which is available on the City website. The Language Access Plan, as amended, shall continue to serve as the City's

procedures for assessing its language needs and identifies any need for translation of notices and other vital documents.

Persons with Disabilities

To encourage the participation of persons with disabilities, the City will continue to include the following language in all of its public meeting notices published in the *Columbus Ledger-Inquirer*:

The building is handicapped accessible. Persons requiring special accommodations can make arrangements by contacting the Community Reinvestment Department, 1111 1st Avenue, 3rd Floor, Columbus, GA 31901 (phone 706- 653-4613). The City TDD number is 1-800-225-0056.

The City will conduct all public meetings in locations that are handicapped-accessible.

If requested, the City will mail copies of public meeting notices to persons who are homebound and request such accommodation no less than seven days prior to the public meeting.

Low- and Moderate-Income Persons

When conducting in-person public meetings, the City will conduct at least one public meeting in a neighborhood that contains 51% of low and moderate-income residents based on HUD data, during the development of the Assessment of Fair Housing, the Consolidated Plan and the Annual Action Plan.

Organizations and Agencies

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved

through stakeholder interviews, focus groups and/or public meetings held during the development, revision, amendment, adoption and implementation processes for all documents covered by this Plan.

Local Public Housing Authorities

The City encourages, in consultation with local public housing agencies, the participation of residents of any public and/or assisted housing developments located within the City, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the executive directors of the Columbus Housing Authority and the Phenix City Housing Authority about the Assessment of Fair Housing, its affirmatively furthering fair housing strategy, and Consolidated Plan activities related to the public housing developments and communities so that the housing authorities can make this information available at the annual public hearings required for their respective Public Housing Authority Plans.

The City encourages participation by resident advisory boards and resident councils of local public housing authorities. This will be carried out by providing the local housing authorities information on public meetings, surveys and other outreach initiatives related to the documents covered by this Plan.

Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the *Ledger-Inquirer* no less than seven days before the public review and comment period commences or the public hearing is held.

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for

persons with disabilities and Spanish speakers in accordance with this Plan.

Public Meetings

Public meetings will be used as an additional participation tool to supplement Public Hearings.

Technical Assistance

Staff from the Community Reinvestment Department are available to assist organizations and other eligible individuals that are interested in submitting a proposal to obtain funding through the CDBG, HOME, and ESG programs. All potential applicants are strongly encouraged to contact the Department for technical assistance before initiating a funding request application.

Online Access

The City will post draft copies and final copies of all documents covered by this Plan on its website accessible at:

<http://www.columbusga.org/CommunityReinvestment/>

Other Engagement Techniques

The Citizen Participation Plan has been and will continue to be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

City Contact Person

All communication regarding the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Pamela Hodge

Deputy City Manager, Finance, Planning and Development
Columbus Consolidated Government

1111 1st Avenue, 4th Floor Columbus, GA 31901

Email: PHodge@columbusga.org

Phone: (706) 653-4613

C. The Citizen Participation Plan

Plan Development

The City shall follow the following procedure when amending its Citizen Participation Plan:

A. Public Review of the Draft Plan

The draft Citizen Participation Plan will be made available for public review for a 30-day period prior to City consideration and adoption and may be done concurrently with the public review and comment process for the Consolidated Plan. The Citizen Participation Plan shall be provided in a format accessible to persons with disabilities upon request.

Copies of the draft Citizen Participation Plan will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

B. Public Hearing

The City will conduct a public hearing to accept comments on the draft Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

C. Comments Received on the Draft Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public review period.

D. City Council Action

Following the public hearing, the Plan will be presented to City Council for consideration and formal action. A summary of all written comments and those received orally during the public hearing, as well as the City's responses to all written comments, will be attached to the Plan prior to submission to City Council.

E. Submission to HUD

The Citizen Participation Plan will be approved as a stand-alone document and submitted to HUD with a summary of all written comments and those received orally during the public hearing as well as the City's responses to written comments and proof of compliance with the 30-day public review and comment period requirement. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved Citizen Participation Plan, as needed:

A. Amendment Considerations

The City will amend the Citizen Participation Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur. Minor edits to the Plan, to include changes to contact information or editorial changes for clarity, will be posted on the Community Reinvestment website and will not be subject to the 15-day comment period.

B. Draft Amended Plan Review

The draft Amended Citizen Participation Plan will be made available for

public review for a 15-day period prior to City consideration and adoption and may be done concurrently with the public review and comment process for the Consolidated Plan or Annual Action Plan. Copies of the draft Amended Citizen Participation Plan will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

C. Comments Received on Draft Amended Citizen Participation Plan

Written or oral comments will be accepted by the City Contact Person, or a designee, during the public review period.

D. Public Hearing

The City will conduct a public hearing to review and accept public comments on the draft Amended Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan or Annual Action Plan.

E. City Council Action

Following the public hearing and comment period, the Plan will be presented to City Council for consideration and formal adoption.

F. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

G. Plan Access

The approved Amended Citizen Participation Plan will be kept on file at the Community Reinvestment Department office located in the City Hall building at 1111 1st Avenue, 3rd Floor, Columbus. The plan can be accessed online at: <http://www.columbusga.org/CommunityReinvestment/>. Hard copies will be made available to those requesting the approved Amended Plan by contacting the City Contact Person, or a designee.

D. The Consolidated Plan (CP)

Plan Development

The City will follow the process and procedures described below in the development of its Consolidated Plan (CP):

A. Stakeholder Consultation and Citizen Outreach

In the development of the CP, the City will consult with other public and private agencies including, but not limited to, the following:

- Local public housing authorities
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

When preparing the portion of the CP concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies

and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the city sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft CP and how to access a copy online for review and comment. In addition, the City will submit its non-housing community development plan to the Georgia Department of Community Affairs.

When preparing other plans associated with the CP, such as a Redevelopment Plan, the City will follow the guidelines presented under this section for citizen participation or amendments.

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

B. Public Hearings

The City will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the CP draft is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day

public comment period during which the City will address identified housing and community development needs, proposed eligible activities. Public meetings can also be held as supplemental to the public hearing if needed.

C. Potential Displacement of Persons

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced.

When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the City shall compensate residents who are actually displaced in accordance with HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition.

D. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the actual grant funding amounts as provided by HUD (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG HOME, or ESG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; when the document will be considered for action by City Council; and, the anticipated submission date to HUD.

The City may draft its Consolidated Plan on its normal timetable and carry out citizen participation activities using estimated funding amounts. The

City must state clearly in its public notices that: (1) the draft plan is based on estimated amounts, and (2) all proposed activities' budgets will be increased or decreased proportionally from the estimated funding levels to match actual grant amounts. For example, if the actual grant amounts are 2% greater than estimated funding amounts, each activity budget should increase by 2%, not to exceed the actual grant amount.

Copies of the draft CP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

In addition, the City will make available a reasonable number of free copies of the draft document to residents and groups that request them.

E. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to City Council and to HUD. *All citizen participation activities must be completed prior to incurring pre-award costs.*

F. City Council Action

Following the public hearing and 30-day public display and comment period, the CP will be presented to City Council for consideration and formal action.

Revisions to the Consolidated Plan

The City shall follow the following procedure to revise its CP, as needed:

A. Revision Considerations

There are two types of amendment that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- When a change occurs in the priorities established in the CP such as an addition of a new activity.
- When new HUD grant programs are added to annual entitlement funding.

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Reinvestment Department staff and will not require a public comment period. These changes will be fully documented and signed by the City Manager or their designee.

The City may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the City Manager or their designee.

B. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft

Revised CP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

C. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to City Council and to HUD.

D. City Council Action

Following the public hearing, the Revised CP will be presented to City Council for consideration and formal action.

E. Submission to HUD

The Revised CP will be submitted to HUD within 30 calendar days following the end of the public display and comment period.

Plan Access

The HUD-approved Revised CP will be kept on file at the Community Reinvestment Department office located in the City Hall building at 1111 1st Avenue, 3rd Floor, Columbus. The plan can also be accessed online at: <http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the HUD-approved Consolidated Plan by contacting the City Contact Person, or their designee.

E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the CP, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the City's method for distributing funds to local non-profit organizations; and, the geographic areas of the City to which it will direct assistance.

Plan Development

The City will follow the process and procedures described below in the development of its AAP.

A. Public Hearings

The City will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the AAP draft is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

If virtual hearings are used, accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

B. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Columbus City Council, and the anticipated submission date to HUD.

The City may draft its Annual Action Plan on its normal timetable and carry out citizen participation activities using estimated funding amounts. The City must state clearly in its public notices that: (1) the draft plan is based on estimated amounts, and (2) all proposed activities' budgets will be increased or decreased proportionally from the estimated funding levels to match actual grant amounts. For example, if the actual grant amounts are 2% greater than estimated funding amounts, each activity budget should increase by 2%, not to exceed the actual grant amount. Copies of the draft AAP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

C. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD. *All citizen participation must be completed prior to incurring pre-award costs.*

D. City Council Action

Following the public hearing and 30-day public display and comment period, the AAP will be presented to City Council for consideration and formal action.

Revisions to the Annual Action Plan

The City shall follow the following procedure to revise its AAP, as needed:

A. Revision Considerations

There are two types of amendment that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible project is added or deleted
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Reinvestment Department staff, and will not be subject to public comments. These changes will be fully documented and signed by the City Manager or a designee.

The City may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the City Manager or a designee.

B. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Columbus City Council, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

For projects subject to waivers or other program flexibilities related to

pandemic response or other emergency situations, the Columbus Consolidated Government may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to emergency conditions.

C. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30- day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

D. City Council Action

Following the public hearing, the Revised AAP will be presented to City Council for consideration and formal action.

Plan Access

The HUD-approved Revised CP will be kept on file at the Community Reinvestment Department office located in the City Hall Building at 1111 1st Avenue, 3rd Floor, Columbus, GA. The plan can also be accessed online at: <http://www.columbusga.org/CommunityReinvestment/>

Hard copies can be made available to those requesting the HUD-approved Revised AAP by contacting the City Contact Person, or their designee.

F. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

The City shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

A. Report Considerations

The Community Reinvestment Department staff will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME, and ESG, and draft the CAPER in accordance with HUD requirements.

B. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

C. Comments Received on the Draft CAPER

Written comments will be accepted by the City Contact Person, or a designee, during the 15- day public display and comment period. The City will consider

any comments or views of City residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to City Council and to HUD.

G. Section 108 Loan Guarantee Program

Development of Section 108 Loan Guarantee Application

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Citizen Participation Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

Public Display and Comment Period

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD, and may be done concurrently with the public review and comment process for the five-year Consolidated Plan. Copies of the proposed Section 108 loan application will

be made available for review at the following locations:

- Online at <http://www.columbusga.org/CommunityReinvestment/>
- 1111 1st Avenue, Columbus Consolidated Government City Hall, 3rd Floor, Community Reinvestment Department

Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final application. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final application for submission to HUD.

H. Complaints

Residents may register complaints regarding any aspect of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), or Emergency Solutions Grant (ESG) programs by contacting the City Contact Person, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final Consolidated Plan may send written objections to the Atlanta Field Office MLK Jr. Federal Bldg. 77 Forsyth St. SW Atlanta GA, 30303. Objections should be made within 30 calendar days after the City has submitted the Consolidated Plan to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant
- The application does not comply with the requirements of the CDBG,

HOME, and/or ESG programs or other applicable laws

- The application proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.