

**Citizen Participation in
Housing and Community Development:**

A Handbook for Planning, Decision Making,
Implementation, and Evaluation.

State of Tennessee
Housing and Community Development
Citizen Participation Plan and Handbook
2016

Lead Agency

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Table of Contents

Introduction	1
Purpose	2
Mission	3
Context for Planning	4
Coordination and Leadership	4
Consultation	6
Encouragement of Citizen Participation	7
Citizens and Local Government Comment	8
Development of the Consolidated Plan	8
Amendments	10
Performance Reports	11
Citizen Participation Requirements for Local Governments	12
Availability to the Public	12
Access to Records	13
Concerns	13
Use of the Citizen Participation Plan	13

Introduction

This handbook is a guide for housing and community development professionals who work with citizens to develop and carry out citizen participation activities within the wider context of development policies and programs. It will also serve to provide a better understanding of the citizen participation process; define responsibilities of development professionals at several levels; apply experience and research in citizen participation program development to housing and community development work.

Effective citizen participation plan development is based on the philosophy that people have both the desire and ability to plan and carry out development programs to enrich their lives. The degree to which this is accomplished depends on people having opportunities to learn and apply knowledge, imagination, and experience toward solving mutual problems. This handbook suggests sound and proactive ways to develop programs and plans using a citizen participation process.

Experience has proven that effective development programs can be achieved only with the support and involvement of citizens.

Some major benefits of a citizen participation plan as part of the program development process are:

1. It keeps development professionals in direct touch with the people that programs are designed to benefit (program beneficiaries).
2. It increases the quality and effectiveness of programs because the knowledge, creativity, and leadership skills of many people are utilized. People feel a greater responsibility for the success of programs when they help to develop them.
3. The involvement of citizens multiplies the efforts of development professionals and produces more successful programs than professionals could produce alone.
4. It provides for continuous evaluation in which people determine program progress and set new objectives to keep programs going in the right direction.
5. It provides a means of coordinating programs with other groups, organizations, or agencies that are addressing problems of the same or similar nature.
6. It helps to identify resources needed to conduct effective programs and to legitimize these needs.
7. It will help people develop their confidence and leadership. People will have an opportunity to satisfy their basic needs to participate as members of a group, render service, and receive recognition.

Purpose

The Consolidated Plan combines the planning, application, and reporting processes for five HUD formula grant programs: the Community Development Block Grant (CDBG), the Emergency Shelter Grant (ESG), the HOME Investment Partnership Program (HOME), National Housing Trust Fund (NHTF), and the Housing Opportunities for Persons with AIDS Program (HOPWA).

This handbook is a guide and reference for the development of these programs. It contains information related to national and state housing and community development policy regarding citizen participation and program development.

The Consolidated Plan examines the current housing situation, explores the housing and community development needs of the state, and sets priorities for spending HUD grant monies. A vital component of exploring the state's housing and community development needs and setting spending priorities is the participation of citizens. The development of the State's Consolidated Plan will offer local organizations and citizens the opportunity to play an active and vital role in the process of statewide strategic planning.

We believe that the involvement of local organizations and people is essential to the development of effective programs. It is expected that this handbook will be a valuable tool for meeting the challenge of working in partnerships with citizens to provide sustainable housing and community development opportunities for Tennessee's communities.

The citizen participation plan is designed to encourage citizens to:

1. Participate in the development of the consolidated plan;
2. Participate in any substantial amendments to the consolidated plan;
3. Participate in a review and comment process for the annual performance evaluations and reports.

The intended outcome of the consolidated planning process is the integration of the broad base of knowledge and expertise of citizens and workers in the housing and community development fields. Together, state agencies and community-based organizations are one of the state's most valuable assets - a major investment of resources in the state's future. The State's consolidated plans can help maintain a good return on that investment by responding to Tennesseans' varied needs for economic growth and stability.

Future program efforts will focus in four areas: providing decent housing; providing a suitable living environment; providing expanded economic opportunity; improving the effectiveness of programs.

Tennessee Consolidated Planning will use a priority-focused planning process that will coordinate housing and community development activities among program units throughout the State and encourage solution-oriented, multidisciplinary programs. This will require a planning and management process that is appropriate for the complexity

of the organizational structure, the changing external factors influencing programs, and the need to be accountable for the public and private resources it has been granted or that it will coordinate.

Mission of the Citizen Participation Plan

1. Identify Tennessee's current and anticipated housing and community development needs and capacities.
2. Provide a systematic analysis of the state housing market including:
 - a. characteristics of households and the housing stock;
 - b. estimates of housing problems, particularly low and moderate income households;
 - c. diagnosis of market imbalances underlying the problems.
3. Provide a factual basis for local programmatic strategies and spending priorities.
4. Provide evidence to inform state and local decision makers about which housing market and community development problems warrant intervention.
5. Provide evidence to inform state and local decision makers about how scarce resources should be allocated between different housing and community development activities, needs, and initiatives.
6. To explore meanings and implications of housing market conditions for local and state policy choices.
7. To provide basic information about housing conditions and community development trends at the national, state, regional, county, and community levels.
8. To serve as a benchmark against which local communities, state agencies, and advocates can compare their housing and community development concerns and situations.
9. To provide illustrations, by highlighting key national, state, and regional variations of ways communities and states encourage citizen participation to develop strategies for addressing problems, needs, and capacities.
10. To discuss ways in which systematic housing market analysis and community needs/capacities surveys can inform local debate about housing needs, community priorities, and mechanisms for public and private sector involvement.
11. To create a dynamic plan of work derived from a long-range vision of the future.
12. To create incremental, achievable activities that cause small successes and encourage further participation, leading to eventual accomplishment of the long- range vision.

Creating a Context for Planning and a Basis for Citizen Participation

Planning Assumptions

1. The capacities of people within the neighborhoods and communities of the state should provide a basis for development rather than continuing dependencies on outside resources, expert advice, technology, and financial aids.
2. Successful programs anticipate change, thereby increasing options for action.
3. A holistic focus rather than a piecemeal approach to problems and challenges can produce more effective results.
4. Long-term, sustainable development models provide a better framework for planning than do short-term relief programs.
5. Programs administered as resources for change rather than a service for predetermined and prepackaged needs and situations are more productive.
6. Plans and programs that reflect relevancy to the daily lives of citizens and are based on human relationships rather than technological solutions to human problems will prove more effective and productive.
7. Plans and programs should be developed from the bottom-up being inclusive and accessible and reflecting a collective ability to act as a team, rather than from the top-down.
8. Innovation is valued above maintenance: planning and programming for what could be, instead of maintenance of the way things are.

Coordination and Leadership

If consolidated planning in Tennessee is to be effective, participants in the process must be guided by common vision, a clear mission, and a solid resolve to learn new approaches to old and persistent problems.

The best planning strategy is a collaborative effort by state and local institutions, community groups, citizens, and government officials. Developing partnerships among these interests, both in and out of government, would ease community-building efforts and problem solving for the Tennessee Consolidated Plan. One of the most important aspects of this role is finding methods to expand the structural base of consolidated planning to include more participants in the process.

The Plan offers leadership toward a unified planning approach for Tennessee in the following ways:

- ☐ *Mission: Helping Tennesseans create communities of opportunity.*
- ☐ *Unified Approach: A unified planning approach requires that assistance by HUD not be viewed as a laundry list of separate programs. Help provided to Tennessee by HUD should be seen as an invitation to the state to develop and embrace a comprehensive vision of housing and community development. By doing so, Tennessee's communities will become better places to live and work.*
- ☐ *Elements of the Comprehensive Vision: A comprehensive and intelligent plan should include affordable housing, adequate infrastructure, fair housing, opportunity for economic growth coordinated with human development.*

Tennessee has identified resources and capacities to deal with housing and community development change. In addition, Tennessee maintains that housing and community development planning and programming is best accomplished through a unified and comprehensive vision of the future. A common vision of the future in Tennessee can open new opportunities for collaboration and collective problem solving. Partnerships among state agencies and among government and private organizations must be developed to build a framework that will enable the achievement of the visions and goals of the plan.

Preparing for the Consolidated Plan in Tennessee

The overarching mission of the consolidated planning process is to help Tennesseans build communities of opportunity. Our communities are witnesses to an enormous tangle of problems in such areas as education, public safety, housing, infrastructure, health, and employment that seem to grow in their complexity each year. The enormity of problems is matched, however, by opportunity for success. The deciding factor depends on the human element: how well community members build understanding and action toward solutions.

Community and statewide problems are first and foremost human problems. The willingness to recognize, understand and take action on community and statewide issues is in question. As Tennesseans plan and work to build communities of opportunity, they must concentrate on what new skills, new attitudes, and new values are necessary to live in a global community of change. This may require shifting the way problems have been viewed in the past and looking to develop resources and capacities yet to be discovered within the community. It has been said anonymously that, "Discovery is seeing what everyone has seen and thinking what no one else has thought."

The Process

The Tennessee Housing Development Agency (THDA) received designation as the lead agency for the Consolidated Planning process from Governor Ned R. McWherter in September 1994. That designation continues in effect for the current Consolidated Plan.

A working committee was organized to gather and analyze housing and community development data about Tennessee. This committee became the Consolidated Planning Team. The planning team was assisted in their work by existing plans, strategies, and vision documents of federal and state agencies, regions, local communities, and private organizations. Members of the planning team consulted individuals and constituent groups to compile a statement of needs and prepare an analysis of conditions that may require intervention and assistance.

In addition to the planning team the state conducted a series of meetings throughout the state to give communities opportunity for greater input into the Consolidated Plan. Comments and input from these meetings were used to determine need and set goals for the programs. The community meetings were coordinated through the nine Development Districts of the State who assisted in placing notices in newspapers, sending letters, contacting local groups, making follow-up calls and setting up meeting sites.

Consultation

When preparing the consolidated plan, the state will consult with public and private agencies that provide assisted housing (including any state housing agency administering public housing), health services, social services, affordable housing advocates, and housing and community development trade associations,. This consultation will include those agencies focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, economically and socially disenfranchised and impoverished persons.

When preparing the lead-based paint hazards portion of the plan, the state will consult with 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 method of distribution of assistance under the CDBG program, the State will consult with local governments in non-entitlement areas of the State.

Consultations will be carried out by each state agency participating in the consolidated planning process. The State will provide for and encourage citizens to participate in the consultation phase of the consolidated plan. In addition, citizens are strongly encouraged to develop on-going communication with state agencies providing assistance in their community building process.

Each state agency and each community has varying communication styles. Some of the activities that will contribute to successful consultations should include:

Community outreach and education activities. General informational mailings and announcements. Public hearings. Marketing publications. Workshops. Technical assistance seminars. Solicitation of appropriate advocacy group participation. Encouragement of community-based citizen participation activities. Survey questionnaires.

Encouragement of Citizen Participation

The State intends to provide for and encourage citizens to participate in the development of the Consolidated Plan, and in substantial amendments to the Consolidated Plan, and all annual performance evaluations and reports in the interim. The State will take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Activities will include traditional and nontraditional forms of community and citizen participation and will be designed to be appropriate for the type of citizen participation needed. Potential activities include are outlined above in the section title Consultation.

Communities and citizens are encouraged to seek out opportunities to appropriately contribute to community building activities in their neighborhood or community.

The State will design citizen participation activities to especially encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used and by residents of predominantly low- and moderate-income neighborhoods as defined by the State.

Citizens and Local Government Comment on the Citizen Participation Plan and Amendments

The State will provide citizens and units of general local government a period of 15 calendar days to comment on the citizen participation plan and on substantial amendments to the citizen participation plan. The State will make the citizen participation plan public and in a format accessible to persons with disabilities, upon request.

Development of the Consolidated Plan

The following requirements will be included for the development of the Consolidated Plan.

- ☐ Prior to adoption of the Consolidated Plan, the State will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the State expects to receive and the range of activities that may be undertaken. The plan will also include the estimated amounts that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced. This requirement applies to the Annual Action Plan submitted each year. This information will be made available through traditional and non- traditional activities and mediums for a period of 30 calendar days. The requirement will be met by publishing a summary of the proposed consolidated plan in newspapers serving the largest population centers in the State and by making copies of the proposed consolidated plan available at public, accessible places such as libraries, government offices, and in electronic format.
- ☐ The State will publish the proposed consolidated plan in a manner that affords citizens, units of general local government, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The State will publish the proposed consolidated plan in both print and electronic formats and give citizens a period of 30 calendar days to examine the contents of the proposed consolidated plan. The requirement will be met by publishing a summary of the proposed consolidated plan in newspapers serving the largest population centers in the State and by making copies of the proposed consolidated plan available at government offices, in electronic format, and other public places. The summary will describe the content and purpose of the consolidated plan, and include a list of the locations where copies of the entire proposed consolidated plan may be examined or read. In addition, the State will provide a reasonable number of free copies of the plan to citizens and groups that request it.
- ☐ At a minimum, the State will conduct at least one public hearing on housing and community development needs before the proposed Consolidated Plan is published for comment.
- ☐ The State recognizes that any single activity or format will not adequately address the need for increased citizen participation. State agencies will offer a variety of opportunities and activities to encourage broad-based community participation in housing and community development projects. State agencies encourage the meaningful involvement of citizens because citizen participation contributes to the near term success and long term sustainability of development projects.
- ☐ Adequate advance notice of the hearing will be given to citizens with sufficient information published about the subject of the hearing to permit informed comment. Advanced notice will be made through the print and electronic media at least 15 calendar days prior to the hearing. Small print notices in the newspaper a few days before the hearing will not constitute adequate notice and will not be used.
- ☐ The hearing will be held at a time and location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities. All sites for public hearings will be accessible to persons with physical disabilities. Arrangements for persons with other types of disabilities will be made as

requested in advance by any citizen wanting to attend. The advertisement for the hearing will contain a statement of nondiscrimination and the name of a contact person for special accommodation required for persons with disabilities.

- ☐ In the case of public hearings, the needs of non-English speaking residents will be met where a significant number of non-English speaking residents could be reasonably expected to participate. As with persons with disabilities, arrangements for non-English speaking citizens will be made if adequate advance notice is received from such citizens by the State. With adequate advance notice, arrangements for their full participation in the public hearing will be made. The advertisement for the hearing will contain a statement of nondiscrimination and the name of a contact person for special accommodation required for non-English speaking persons.
- ☐ A period of 30 calendar days will be allowed to receive comments from citizens and units of general local government on the proposed consolidated plan.
- ☐ The State will consider any comments or views of citizens and units of general local government received in writing, or orally at the public hearing, in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Consolidated Plan. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance.

It is highly probable that many of the above requirements relative to the development of the State's consolidated plan will be accomplished through the electronic media and similar methods not yet fully developed by state government.

Amendments and Criteria for Substantial Amendments to the Consolidated Plan

This part of the citizen participation plan outlines the criteria the State will use for determining what changes in the State's planned or actual activities constitute a substantial amendment to the consolidated plan.

The State will consider any comments or views of citizens and units of general local government received in writing when preparing amendments to the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final amendment. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance. A period of 30 calendar days will be provided to receive comments on a substantial amendment before the amendment is implemented.

Amendments to the Consolidated Plan

The State cannot operate federal grant programs in a manner that is inconsistent with Federal Regulations. This implies that the base for establishing criteria for substantial amendments is conformity with the Federal Regulations. The State has flexibility for program operation only within the confines of the governing Federal Regulations.

Table A: Presents criteria for substantial and non-substantial amendments to the consolidated plan. It should be noted that substantial amendment criteria as shown in the first column, are those changes that affect the core values of the consolidated plan and process. These values keep guard over the comprehensive nature and citizen participation process used to develop the State's housing and community development policies. Changes to these core concepts are considered substantial and serious because they reflect a redirection of State housing and community development policy, objectives, and action steps.

The second column in Table A has criteria for non-substantial amendments. Non-substantial amendments relate directly to the daily operation and administration of grant programs by State agencies. These amendments are important but do not reflect a redirection of State housing and community development policy, objectives, and action steps.

Table A. Criteria for Substantial and Non-Substantial Amendments.

<u>Substantial Amendments</u> - <i>subject to a citizen participation process, made public and officially submitted to HUD</i>	<u>Non-substantial Amendments</u> - <i>amendment to be made public and officially submitted to HUD</i>
To change or alter Part III, the strategic plan portion of the consolidated plan.	To change, alter, update, rewrite, correct, or clarify Parts I, II, IV, or V of the consolidated plan to more effectively or efficiently implement Part III, the strategic plan portion of the consolidated plan.
To change the method of distribution of funds for the implementation of the priority needs and action steps of the State as written in Part III, the strategic plan portion of the Consolidated Plan.	To change the actual distribution of funds as a result of Federal budget adjustments of any kind.

Performance Reports

Citizens will be given an opportunity to comment on performance reports. The State will provide a summary of the performance report to the public at least 15 calendar days prior to submission to HUD.

The State will consider any comments or views of citizens received in writing when preparing the performance report. The State will consider any comments or views of citizens and units of general local government received in writing in preparing the final performance report.

A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final performance report submission. Officially received comments will be forwarded by the lead agency to the most appropriate agency for response. The lead agency and the responding agency will work together to prepare the comments for acceptance or the reasons for non-acceptance.

Citizen Participation Requirements for Local Governments

This portion of the citizen participation plan relates only to the citizen participation requirements for units of general local government receiving CDBG funds from the State.

Local governments shall be required to hold two public meetings. These meetings must be advertised in the local newspaper at least 10 calendar days prior to the date of the meeting. The advertisement must contain a statement of nondiscrimination and the name of a contact person for special accommodation required for persons with disabilities. All meeting places must be accessible to persons with disabilities.

The first meeting shall be designed to solicit information about community needs and how CDBG funds can best address those needs. To ensure compliance with Title VI of the Civil Rights Act of 1964, applications must make an additional effort to secure minority participation in this process. A summary of those efforts must be included in the application for funds. Communities shall present information about what activities are eligible, how much money is available, and what kinds of projects are being considered. The second public meeting occurs after the project is complete and is to discuss the accomplishments of the project.

Availability to the Public

The Consolidated Plan as adopted, substantial amendments and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The State will make these documents available to the public upon request, at libraries, local development district offices, through distribution to trade and advocacy organizations, and all other practicable and accessible means requested.

Access to Records

The State will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records related to the State's Consolidated Plan. These same groups will also have access to the planning process for developing the State's Consolidated Plan and the State's use of assistance under the programs covered by this part during the preceding five years. All requests for access to records shall be made in writing through the lead agency:

Tennessee Housing Development Agency, Andrew Jackson Building, 502 Deaderick Street, Third Floor, Nashville, Tennessee 37243-0900.

Concerns

The State will provide for an appropriate and practicable procedure to handle concerns and complaints from citizens related to the Consolidated Plan, amendments, annual performance reports, and the State's future consolidated planning process.

All written concerns and complaints from citizens related to the Consolidated Plan, amendments, annual performance reports, and the Consolidated Planning process shall be made to: Consolidated Plan Lead Agent, Tennessee Housing Development Agency, Andrew Jackson Building, 502 Deaderick Street, Third Floor, Nashville, Tennessee 37243-0900. The Lead Agent will act as a clearinghouse for any written concerns received and direct them to the most appropriate agency or organization for a response.

The State will provide a timely, substantive written response to every written citizen concern or complaint, within 15 working days, where practicable.

Use of Citizen Participation Plan

The State will follow its citizen participation plan and any subsequently approved amendments.

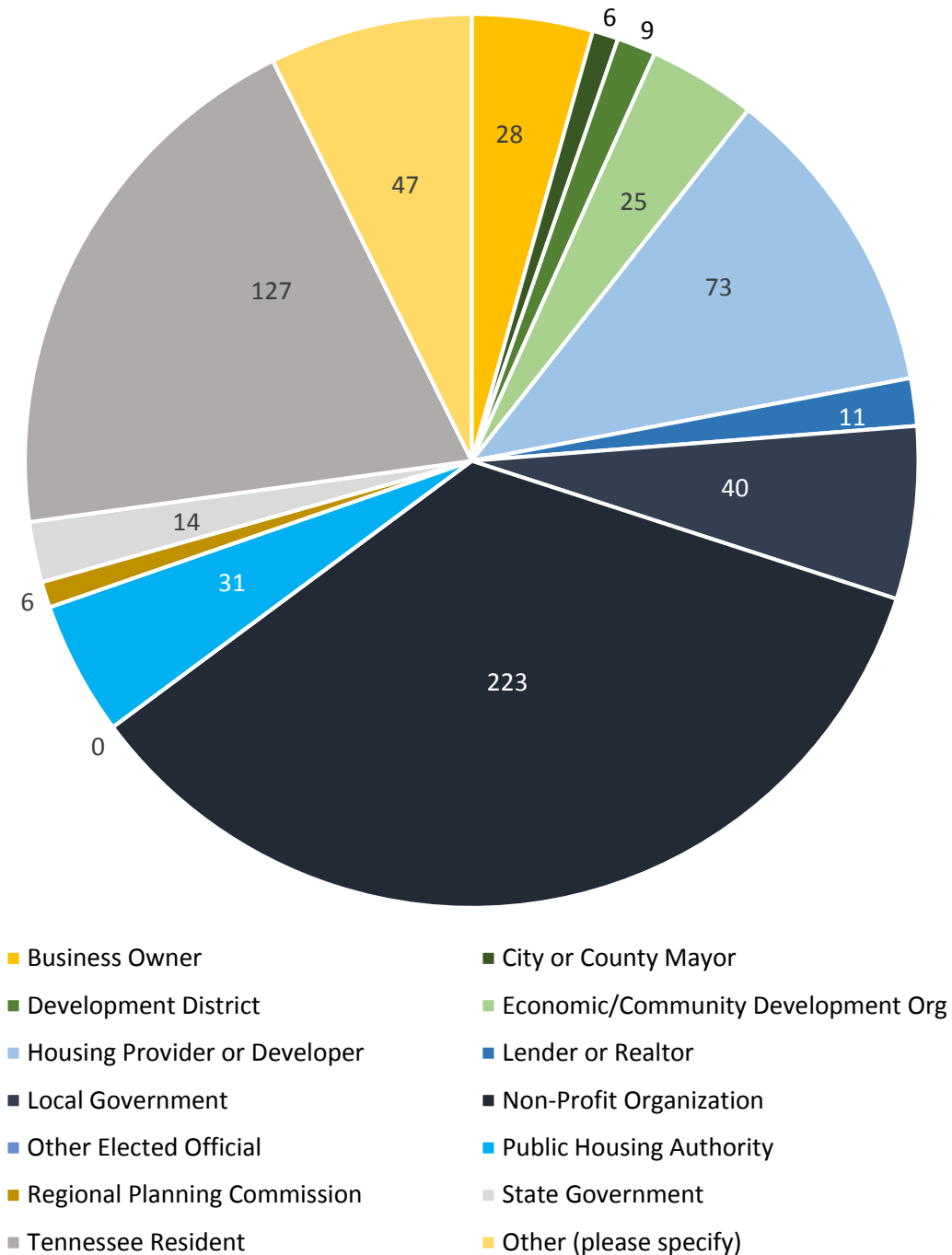
THDA NATIONAL HOUSING TRUST FUND HOUSING NEEDS SURVEY RESULTS

The National Housing Trust Fund (NHTF) is a newly funded federal program that will support the Tennessee Housing Development Agency's efforts to increase and preserve the supply of rental housing for extremely low-income families, including homeless families. In preparation for the start of this new program, a web-based Housing Needs Survey was conducted from February 4th through February 18th of 2016. The survey was completed by 479 respondents. Individuals solicited for participation included elected officials, state and local governing bodies, representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, HOME and ESG grantees, public housing authorities, and other groups involved in the housing and development fields.

The purpose of the survey was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and citizens regarding housing affordability and need in the State of Tennessee. Most questions asked respondents to rank the importance of activities and needs, although many questions allowed respondents to offer written comments.

The following is a summary of the results, which will be used in the development of the new National Housing Trust Fund in the State of Tennessee.

Which best describes you or the organization that you represent? Please check all that apply.



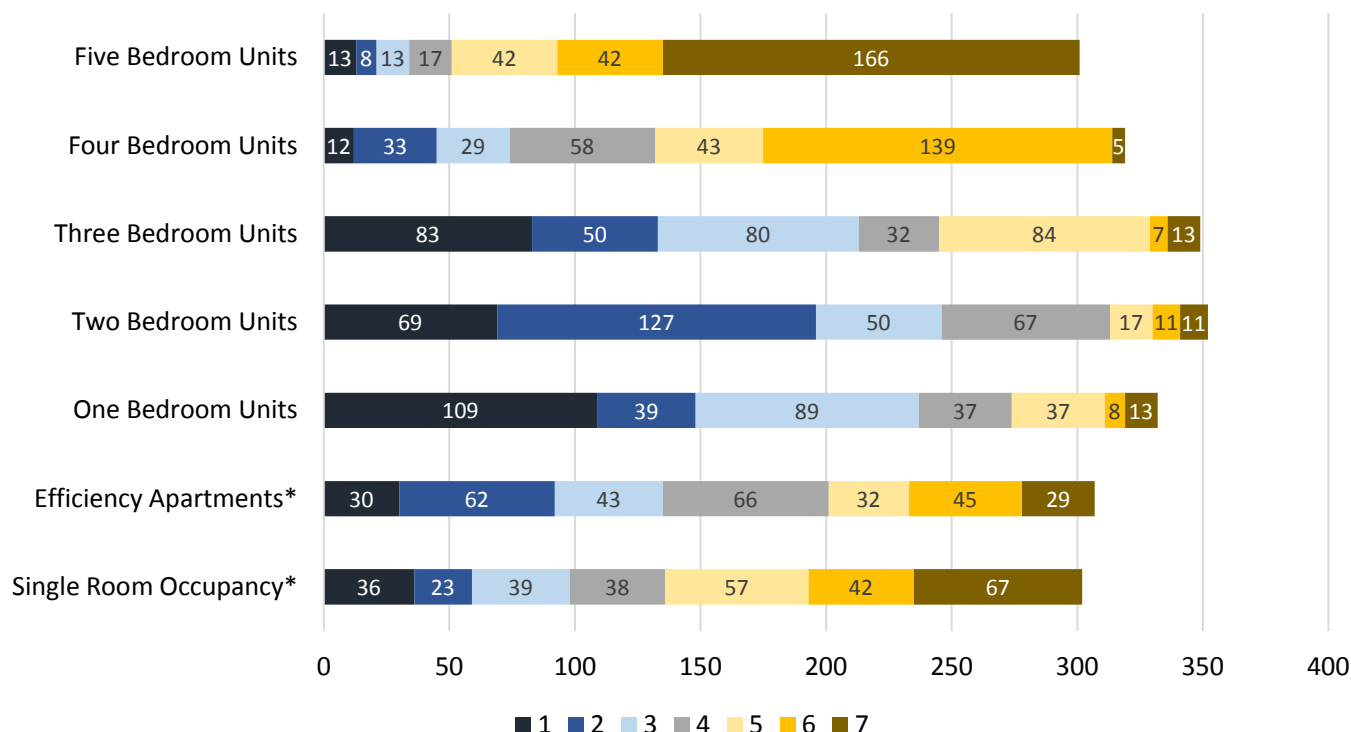
Of the 479 respondents, 223 represented non-profit organizations. The second largest group of respondents was Tennessee residents (127 respondents), followed by housing providers or developers (73 respondents), then local government (40 respondents). There were 47 respondents that selected “other”. The list of responses for the other category is on the following page.

Which best describes you or the organization that you represent? Please check all that apply.

“Other” List of Responses

- Federal Government (3 respondents)
- Church (2 respondents)
- First time homebuyer
- HMIS
- Men's discipleship program for those who have life controlling issues
- Individual
- ID Community Residential provider
- Supported Living provider through DIDD
- In the past we have referred residents to housing/rental assistance. However due to the rent years of abuse of housing our non-profit has agreed to work with resident to provide living able, affordable housing allowing people to be respected as humans giving them back their dignity.
- Disabled
- Non-profit Housing Developer
- NeighborWorks
- Local Foundation
- Self (2 respondents)
- Apartment manager (2 respondents)
- Nonprofit providing supported living to people with disabilities
- Government Non-Profit
- Potential resident
- Non-profit organization (2 respondents)
- Self, personal need
- Housing designer
- Community Action Agency
- Continuum of Care
- Show me \$15
- None
- Attorney
- Accountable Care Organization
- Fair housing advocacy organization
- University
- Affordable Housing Consultant
- Homeless Shelter
- Medical social worker
- School counselor
- Public school system (2 respondents)
- Housing Counseling Agency/Legal Services
- Consultant
- Land Use Planning Consultant
- Headstart
- Market research consultant
- Tennessee Developers Council

Please rank the most needed rental housing size for extremely low-income households in your area.

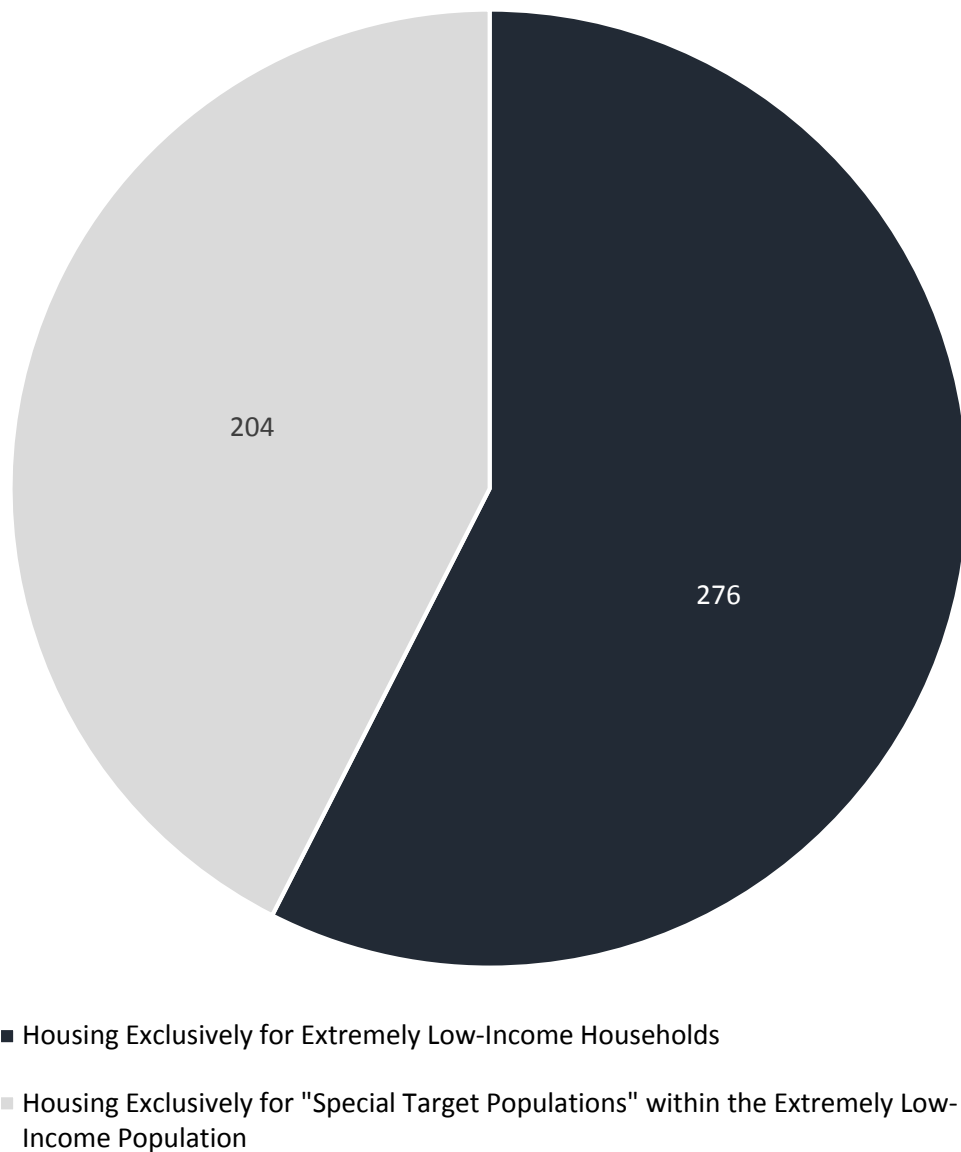


Housing Size	Averaged Ranking Score
Two Bedroom Units	1
One Bedroom Units	2
Three Bedroom Units	3
Efficiency Apartments*	4
Single Room Occupancy*	5
Four Bedroom Units	6
Five Bedroom Units	7

Most respondents ranked one bedroom units as the most needed housing size for extremely low-income households (109 respondents). Three bedroom units followed with 83 respondents, then two bedroom units with 69 respondents. When averaging the rankings, two bedroom units had the lowest average. This means that on average, this housing size was highly ranked as a need most often (2.75 average). One bedroom units closely followed (2.79 average), then three bedroom units (3.16 average). 73 respondents skipped this question.

Public Housing Authorities: Most respondents ranked one bedroom units as the most needed housing size for extremely low-income households (17 respondents). Two bedroom units followed with 4 respondents, then three bedroom units with 2 respondents. When averaging the rankings, one bedroom units had the lowest average. This means that on average, this housing size was highly ranked as a need most often (1.68 average). Two bedroom units followed (2.16 average), then three bedroom units (3.44 average).

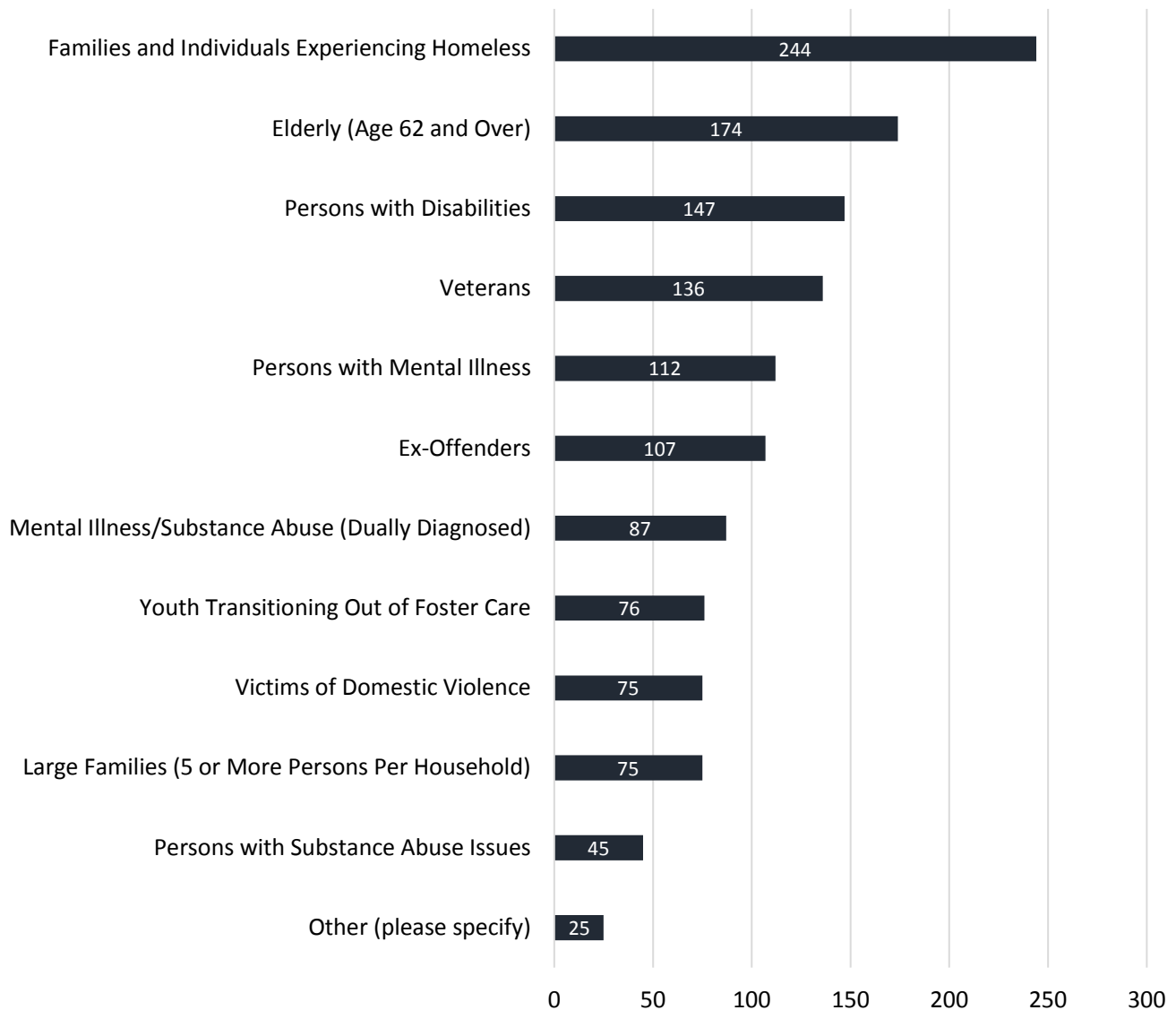
In your area, should the National Housing Trust Fund assist extremely low-income households within “special target populations” or assist extremely low-income, regardless of “special target population”? Check all that apply.



Most respondents selected the “housing exclusively for extremely low-income households” option (276 respondents). The remaining respondents chose housing exclusively for special target populations within the extremely low-income population (206 respondents). 68 respondents skipped this question.

Public Housing Authorities: Most respondents selected the “Housing exclusively for extremely low-income households” option (23 respondents). The remaining respondents chose housing exclusively for special target populations within the extremely low-income population (8 respondents).

Within the extremely low-income population, please select the top three “special target populations” with the highest need for rental housing in your area.



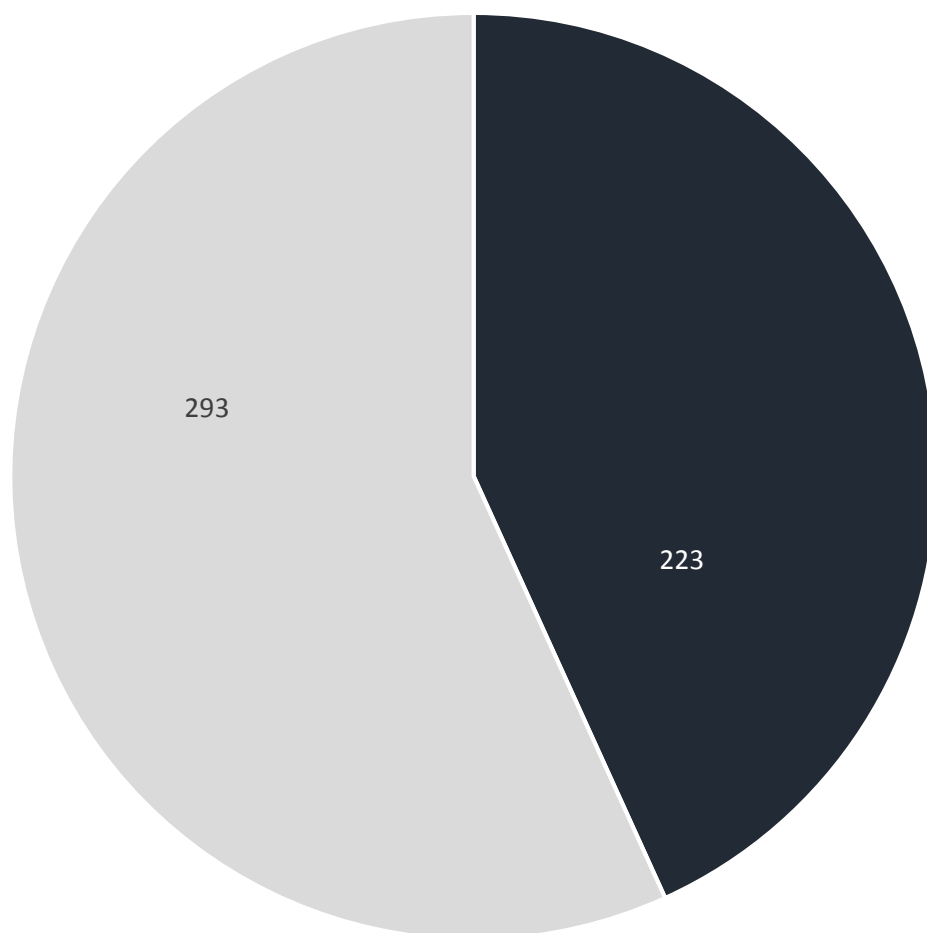
Most respondents selected families and individuals experiencing homelessness as the special target population with the highest need for rental housing (244 respondents). The second most selected special target population was elderly (174 respondents), followed by persons with disabilities (147 respondents). There were 25 respondents that selected “other”. The list of responses for the other category is on the following page. 71 respondents skipped this question.

Public Housing Authorities: Most respondents selected elderly as the special target population with the highest need for rental housing (19 respondents). The second most selected special target population was families and individuals experiencing homelessness (16 respondents), followed by persons with disabilities (15 respondents).

Within the extremely low-income population, please select the top three “special target populations” with the highest need for rental housing in your area. “Other” List of Responses

- Single parents (6 respondents)
- Those who can’t find a job and can’t afford a place of their own without moving in with someone else
- LGBT homeless population
- Our outline for families experiencing homeless includes ex-offenders who lack skills and resources to connect to jobs.
- Families with legal citizen children and not yet citizen parents
- People transitioning out of nursing homes other institutions
- Homeless youth (2 respondents)
- Pregnant mothers
- Young single adults
- LGBT community
- Persons not within a special target population (they actually are a special target population themselves)
- Single Mothers and their children
- Section 8 voucher holders
- Working adults with low-income
- Safe Haven Type Housing for the Chronically Homeless
- Single people who are disabled (who qualify for eff. or single room)
- HIV positive individuals and families
- Adults with developmental disabilities
- Homeless

Please select the type of housing that should be assisted with National Housing Trust Fund resources in your area.
Check all that apply.



- Housing development that is exclusively for extremely low-income households
- Housing for extremely low-income households that may be apart of a mixed income development

Most respondents selected the “housing for extremely low-income households that may be apart of a mixed income development” option (293 respondents). The remaining respondents chose housing development that is exclusively for extremely low-income households (223 respondents). 70 respondents skipped this question. There were 33 respondents that selected “other”. The list of responses for the other category is on the following page.

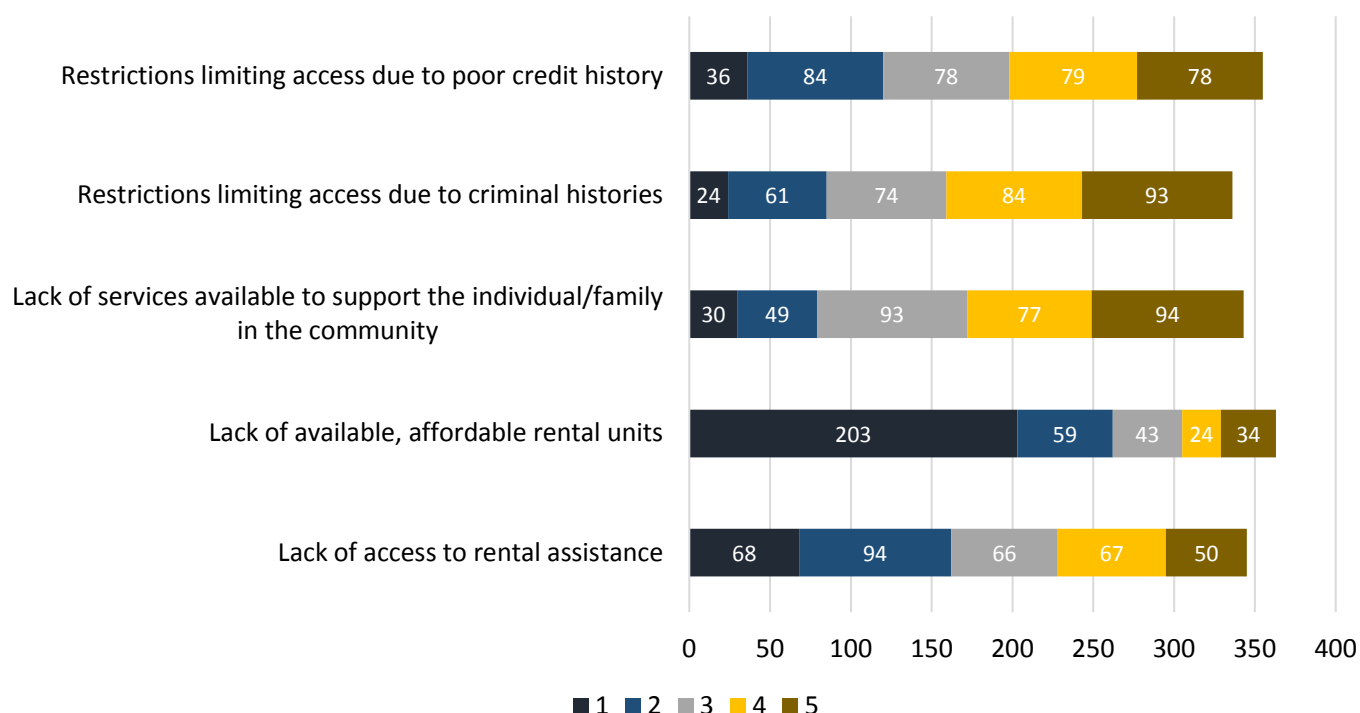
Public Housing Authorities: Most respondents selected the “housing for extremely low-income households that may be apart of a mixed income development” option (18 respondents). The remaining respondents chose housing development that is exclusively for extremely low-income households (17 respondents).

Please select the type of housing that should be assisted with National Housing Trust Fund resources in your area.

Check all that apply. "Other" List of Responses

- Transitional housing for Families
- Those that are only getting government checks and child support
- Housing for ID/DD population
- Retired older adults who are on fixed incomes, some may not fall into low income however they own their homes and due to medical issues or predatory lending find themselves struggling to make ends meet.
- There is a desperate need for home repair. We have plenty of housing. We need to make the existing housing livable.
- Single family housing for extremely low-income households
- Accessible housing for extremely low income households
- Emergency Shelter for those waiting for housing
- Mental health and substance abuse
- Housing for elderly and disabled (2 respondents)
- Housing for extremely low-income individuals with special needs population (3 respondents)
- Elderly housing
- Section 8 Vouchers (2 respondents)
- Family Shelters, Save Havens
- Housing for person with NO INCOME
- Low to mid income housing that is part of mixed income, in neighborhoods of opportunity
- 30% income families receive the majority of assistance provided by other programs. Section 8 contracts serving those families also can exceed maximum tax credit rents to provide an even higher level of income to developments serving those tenants. I hope the agency will be utilizing the 75%/25% offered by Federal rules in this program to serve tenants 75% at 30% of AMI, and 25% will serve the population between 30%-50% of AMI. Those are the tenants that seem to receive less overall assistance, so have need. Also hope the agency will be allowing tenants at 30% of AMI OR persons below the Federal poverty line, as allowed by Federal rules in serving the ELI population.. Would like to see this money allowed to be mixed with other income development types, as in tax credits or even market rate developments.
- College graduates
- Could it be in the form a rental assistance voucher?
- Either of these scenarios would work
- Families fleeing from domestic violence and therefore become homeless
- Housing these population should not be done in large apartment complexes. the clients should be scattered throughout the community so as to blend in with the populations. Maybe scattered buildings with 4 to 8 apartments per building
- Opportunities to purchase used trailers to put on owed land
- Conventional Housing
- Housing for single disabled low income
- Working poor
- Housing for extremely low income close to job centers and retail
- Housing for extremely low-income households with on-site supportive services
- Sex offenders (registry)

Please rank the largest barriers for extremely low-income households in accessing rental housing in your area.



Barriers in Accessing Rental Housing	Average Ranking Score
Lack of available, affordable rental units	1
Lack of access to rental assistance	2
Restrictions limiting access due to poor credit history	3
Lack of services available to support the individual/family in the community	4
Restrictions limiting access due to criminal histories	5

Most respondents ranked lack of available, affordable rental units as the largest barrier in accessing rental housing for extremely low-income households (203 respondents). Lack of access to rental assistance followed with 68 respondents, then restrictions limiting access due to poor credit history with 36 respondents. When averaging the rankings, lack of available, affordable rental units had the lowest average. This means that on average, this barrier was highly ranked as a large barrier most often (1.97 average). Lack of access to rental assistance followed (2.82 average), then restrictions limiting access due to poor credit history (3.22 average). 82 respondents skipped this question.

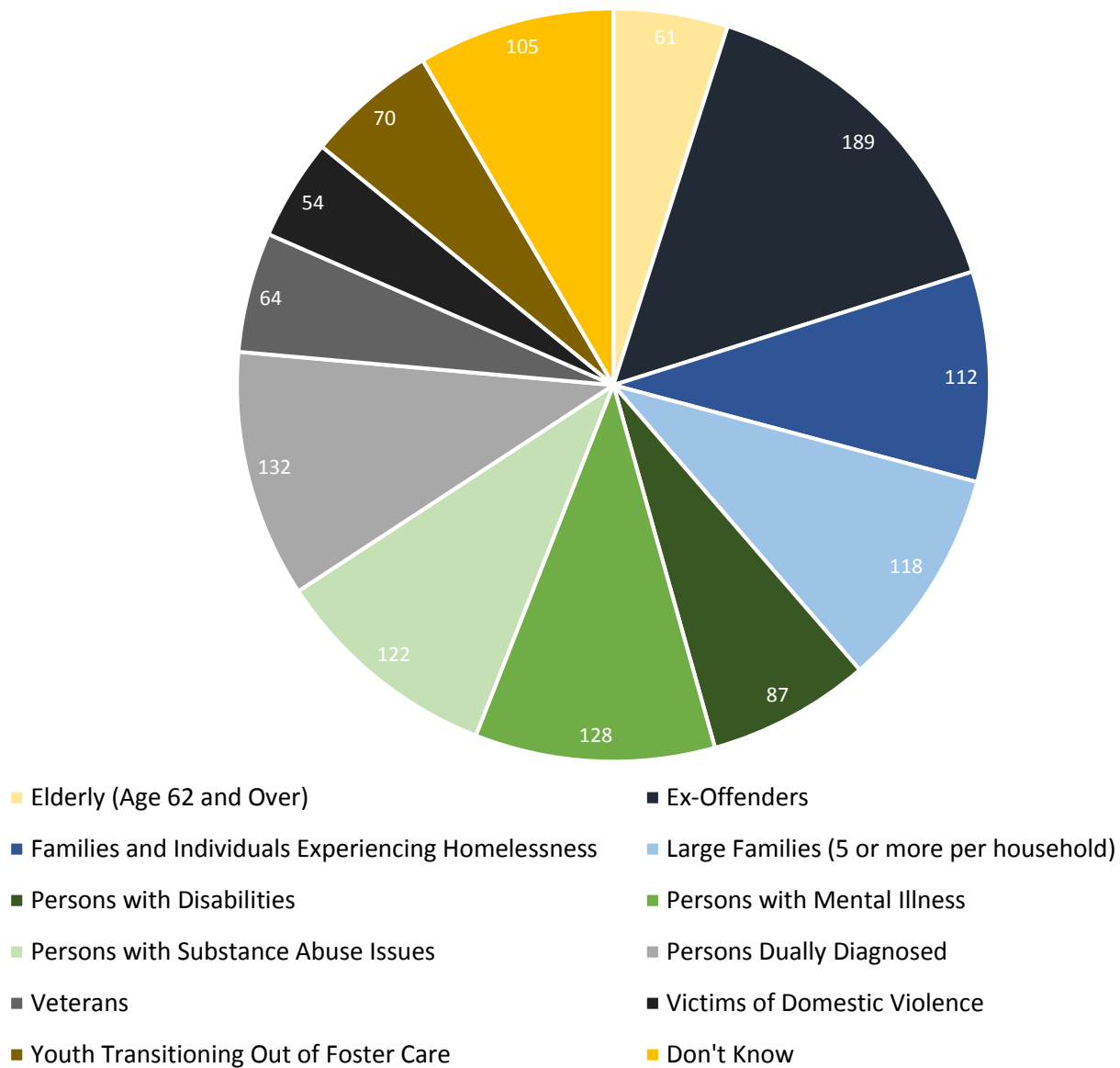
Public Housing Authorities: Most respondents ranked lack of available, affordable rental units as the largest barrier in accessing rental housing for extremely low-income households (17 respondents). Lack of access to rental assistance followed with 7 respondents, then restrictions limiting access due to criminal histories tied with restrictions limiting access due to poor credit history (1 respondent each). When averaging the rankings, lack of available, affordable rental units had the lowest average. This means that on average, this barrier was highly ranked as a large barrier most often (1.56 average). Lack of access to rental assistance followed (2.38 average), then restrictions limiting access due to poor credit history (3.48 average).

Is there another barrier to accessing rental housing that you would rank higher than those mentioned above?

- Lack of assistance for people who are receiving long term services and supports due to a lack of understanding between agencies about programmatic requirements
- Lack of services in assisting with rent
- Education
- Single pregnant females
- Funds for security deposits, first and last month's rent, application fees, and utilities (11 respondents)
- It should read - affordable decent units, which are lacking. Another barrier to accessing housing is underemployment and unemployment.
- ADA Accessibility (8 respondents)
- Availability
- Race
- Getting help when needed and can't afford to move and have nowhere else to go
- Mental illness-unable to comprehend homelessness and the repercussions behind being homeless
- Unemployment
- In Memphis there is not a lack of rental properties. However there is a lack of decent and affordable homes/rental units. It is alarming to me and our organization the number of groups who are connected to those who have intentionally marginalized the working poor. Leaving an outcome of increase crime, drug abuse, domestic violence, poor education, a lack of effective support of public schools in neighborhoods. An extreme an exsult to communities was to dismiss it public schools ~ instead the answers where to create charter schools with many who had a hidden agenda. We are looking at the results of a broken system that has destroyed and torn apart families. HOW do we fix it with real solutions?
- Cost of rental units, lack of sufficient income
- Lack of housing
- People having to choose between paying daycare and rent
- Rental assistance (3 respondents)
- Funding including gap financing and to develop in general (3 respondents)
- Lack of available affordable units not restricted to special populations
- There are a lot of units made available where the landlord does minimal repair before renting the unit but there is nothing else available
- Lack of transportation limits where people can live (11 respondents)
- Individuals going through divorce
- Lack of information or agencies
- Capable contributors manipulating the system
- Lack of support for those with substance abuse and/or mental illness (2 respondents)
- Bad leadership
- Background checks and history of criminal charges (5 respondents)
- Affordable Housing to Middle Class
- Currently affordable housing being razed for new construction
- GENTRIFICATION
- What about single moms with a disability , in the need of rental assistance
- Stigma associated with addiction and mental illness
- Need handicapped facilities
- Lack of internet access to low income individuals
- Vets
- Lack of properly zoned and available building sites

- Youths that have no rental history 18-23 years of age
- Lack of available for people in need of assisted living
- Victims of domestic violence who qualify for assistance due to fleeing abuse have special circumstances that often disqualify them when applying the standard application form. There should be allowances for victims' complicated circumstances.
- Concerns of living close to areas of high crime or poverty
- Adequately paying jobs (3 respondents)
- One's that need assistance can't get while the one's that choose not to work receive it.
- Laziness
- Lack of PERMANENT supportive housing vouchers
- PERSONS WHO LACK INCOME
- Lack of support to mothers who work and receive child support but still don't have enough to make ends meet
- Money, rents have become ridiculous
- Lack of political will
- Demand for student housing has absorbed many affordable rental units.
- High move-in costs for Housing Choice Voucher tenants
- Working poor. Don't make sufficient income to have market choices, but make too much to qualify for public housing. Lack of opportunities for vouchers for choice of housing options & locations.
- The HUD paperwork is extremely hard to navigate.
- Knowledge in locating and obtaining property
- Like my house
- Homelessness
- Assistance for those living on the streets is of utmost essential and high priority.
- Some folks own land but can't afford to rebuild in the event of a disaster
- Exclusionary/restrictive zoning ordinances (2 respondents)
- Appropriate Housing - though some units are affordable and/or accessible it may not be appropriate.
- Private development that drives the rent of existing units higher
- Education of available services
- Government Regulations
- Long waiting lists for affordable/available housing
- Quality rental housing that's affordable (4 respondents)
- Sex offenders and violent offenders
- No available listing of landlords of rental properties
- Licensed homes for individuals with mental illness are not monitored by licensure to insure safety and training for owners.
- Rent increases in this area are outrageous
- No (24 respondents)

To your knowledge, which of the following “special target populations”, if any, are likely to have housing vouchers but are not able to obtain housing because landlords are not willing to accept their voucher in your area? Check all that apply.



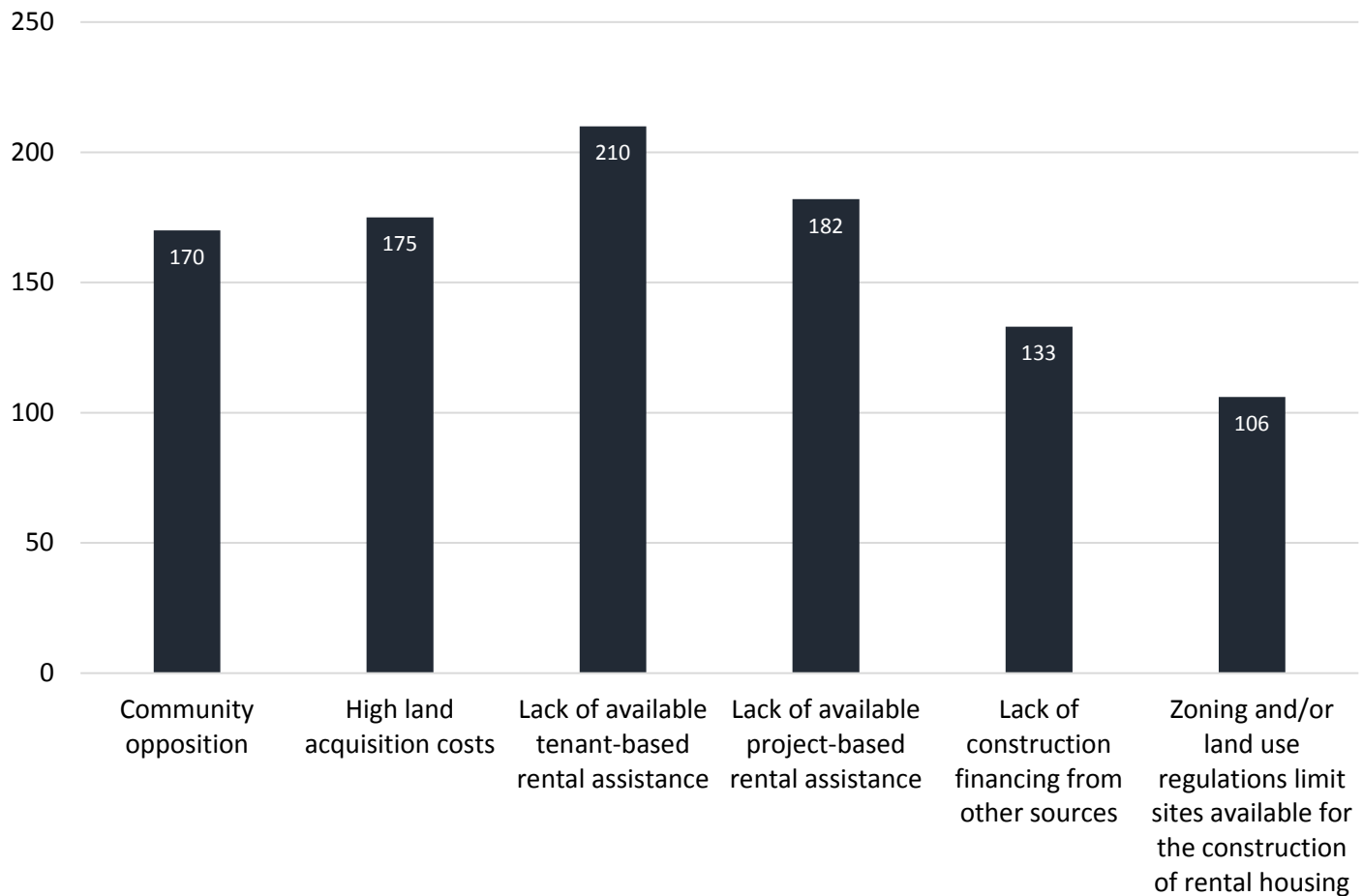
Most respondents selected “Ex-Offenders” as the special target population likely to have housing vouchers but are not able to obtain housing because landlords are not willing to accept their voucher (189 respondents). The second most selected option was “Persons with Mental Illness and Substance Abuse Issues (Dually Diagnosed)” with 132 respondents, followed by “Persons with Mental Illness” (128 respondents), then “Persons with Substance Abuse Issues” (122 respondents). There were 26 respondents that selected “other”. The list of responses for the other category is on the following page. 91 respondents skipped this question.

Public Housing Authorities: Most respondents selected ex-offenders and persons with mental illness and substance abuse (12 respondents each). The next most selected option was persons with substance abuse issues (11 respondents), then persons with mental illness (9 respondents).

To your knowledge, which of the following “special target populations”, if any, are likely to have housing vouchers but are not able to obtain housing because landlords are not willing to accept their voucher in your area? Check all that apply. “Other” List of Responses

- People with poor credit/rental histories (3 respondents)
- African-American
- Those that can't find jobs in the area and don't have money to pay rent due to no money coming in
- LGBT community and single African American men between the ages of 18-21
- In our area, there has been an intent to keep over 500 vacancy. We have attempted to track owners who are listed out of town ~ however have face people conducting their businesses. It's frustrating to witness what we know to be true and the outcomes are families and children suffer.
- All populations may not have access to vouchers but should
- Single individuals
- Youth without a Foster Care history
- The short supply of housing vouchers (2 respondents)
- All subcategories
- All inclusive - ex-offender veterans MI/SU dually diagnosed, especially sex offenders
- None (3 respondents)
- Overall decline in number of properties accepting vouchers
- People with vouchers simply because they have vouchers.
- Veterans with poor credit or eviction history, or prior legal history
- I live in a four bedroom house
- All the above as many landlords are leaving the S8 program
- Our organization serves 17 mostly rural counties, different counties experience different problems.
- Developmental disabilities
- We do not have a Section 8 Program
- Chronically Homeless

Please identify any barriers to the new construction or acquisition/rehabilitation of rental housing in your area. Check all that apply.



Most respondents selected “Lack of available tenant-based rental assistance” as a barrier to the new construction or acquisition/rehabilitation of rental housing in their area (210 respondents). The second most selected option was “Lack of available project-based rental assistance” (182 respondents), followed by “High land acquisition costs” (175 respondents). There were 38 respondents that selected “other”. The list of responses for the other category is on the following page. 96 respondents skipped this question.

Public Housing Authorities: Most respondents selected lack of available project-based rental assistance (15 respondents), followed by lack of available tenant-based rental assistance (14 respondents), then lack of construction financing from other sources (13 respondents).

Please identify any barriers to the new construction or acquisition/rehabilitation of rental housing in your area. Check all that apply. "Other" List of Responses

- No interest in building or rehabbing low income rental property
- Not sure (5 respondents)
- Transparency to the public is lacking in local planning department
- Unnecessary paperwork delays associated with application along with application fees that should be no more than \$25. Number one hindrance is delay in processing priority or immediate requests for housing. It should only take 1 week to approve or disapprove a request for elderly disabled home repairs, rehabilitation requests, not six months
- Wheelchair accessibility
- Pop up groups who are created to keep an agenda of oppression on going. Appearing to work with existing community residents / groups only to gather data for their own agenda. This behavior continues to harm residents in many communities. (New groups relocating residents from one location to another, which causes a multi layered street level problem ~ increase crime ~
- Available funding to support new construction
- Barriers to utilizing the 9% LIHTC program for these type endeavors (2 respondents)
- High construction costs (loan) vs. low repayment because of low rents (2 respondents)
- Not enough for Middle Class
- Limited contractor capacity driving up costs
- Money to convert units to fully ADA/504
- Lack of communication with existing apartment builders/developers to alert potential tenants of rental assistance availability. Majority of tenant applicants are unaware of federal assistance available to meet their needs.
- No money to purchase AND rehab/construct units/shelters/safe havens (2 respondents)
- Lack of sites with accessibility to commonly used services/resources
- Landlords are not willing to endure the paperwork
- Older Large Building being used for Condos
- Complexity of multiple layers of financing to make projects economically viable
- NIMBY is still around, just masked differently now.
- Inclusive zoning laws need to be changed to encourage Voucher units vs low income units which are beyond more of our clients financial means
- I would like to stay in my house and have roommates
- Land
- Tight rental market raising rents, current multi-family construction is for higher-end market rate
- Can it cash flow without guarantee subsidies?
- Fees
- Developers not required or caring about servicing this need
- Lack of accommodations for single, disabled
- Market rates are so low that projects don't pencil out
- Leadership and commitment to make it happen
- Transportation accessibility
- Low county needs score effectively makes jurisdiction not competitive for LIHTC

Please provide any additional comments for our consideration in developing this rental housing program.

- Housing is the larger barriers that prevents efficient coordination
- I believe positive reinforcement can happen if this program allow the housing to provide home quality to inspire a value system. I think strick ruling should be applied and frequent landing. I believe a program can be put together to inspire value to housing.
- We need more section 8 vouchers for this area. Waiting list for housing based on income is more than three years. So hard for low income people to find standard housing they can afford.
- I would really like to see more project-based subsidized housing. Many of our clients can't afford the utilities in tenant-based subsidized housing.
- New projects need to be accessible.
- People on SSI and disabled like other states should be considered for the voucher program as it is hard to afford decent, safe clean housing.
- Much of the existing housing is in very poor condition. (example- bed bugs)
- No one is able to apply due to long waiting list, I moved to Memphis 15yr ago from Michigan and was seeking assistance but was told the list was 13yr long. So I wrote A letter to the Mayor's office with no response, because I knew of people getting on the list and getting vouchers after I tried to apply due to whom they knew. But truly didn't need the assistance, so proper training and screening of employees are a must
- Please be more transparent to the public regarding how the new program will be implemented between the state and Davidson County.
- The homeless population with mental illnesses and criminal arrests are the ones treated unfairly within the rental housing application process. Please consider a telephone application for processing ANY priority homeless individuals in need of immediate housing rental assistance. Majority will have access to a cell phone to call in a representative about their emergency housing needs. This is a simple no cost addition to 211 program, simply connect housing specialists to 211 service to handle emergency housing needs, especially for the elderly, disabled, the mentally ill and the physically disabled. Utilizing the 211 service will save millions in time consuming long form processing and approval methods. Information to screen background checks are available within 5 minutes, which improves overall response time to assist and help the most vulnerable target population find permanent housing within a facility to treat mental illness, substance abuse and reduce the rate of criminal acts associated with being homeless. Presenting a social security card should not hinder an application if the applicant can be verified by automated vital records, i.e., social security administration, birth certificate vital records for proof of citizenship school records, property deeds, etc.
- "Decent" homes are very difficult to find and if found, individuals cannot afford the rent. Most HUD properties are not up to par and sometimes no approved as rental properties by our state inspection team.
- Persons with Developmental disabilities lost a special housing subsidy 18 months ago and this is producing a hardship in West TN for those folks.
- This is a desperate need in Nashville. None of the other efforts are targeting this to the extent needed, which is tremendous. MDHA has been doing the best they can but federal funding has been declining for years and I don't see an end to that.
- NHTF should be mindful of the communities / neighborhoods as far as existing homeowners who care about their community. When creating new development respect the resident by providing a structure that would look like a retirement community or housing units in Bartlett or Germantown. Please be mindful when people are treated as humans with respect connected to supportive tools toward solutions you will see productive outcomes leading to accountability, respect, decrease in crime, increase public school support.
- Over time, I've noticed that the cost of rentals have increased beyond what individuals/families can afford. By lowering costs, the availability of stabilizing households increases chances of improving quality of life.
- Hardly no rental houses available in our area.

- After closing our main mental health and rehab facility we have a surplus of people with these issues that are now homeless.
- I would like to see a commitment to house single parents (and provide supportive services) who are trying to finish college or any accredited technical training program. There is a need for a comprehensive mechanism in place make people aware of special and unique housing opportunities in Shelby County.
- Mentally ill have the least options for available housing
- I am astonished that people in subsidized housing either pay very little or if they work, they pay such a high amount that they cannot pay daycare or other bills. So it is more equitable to not work. There should be more assistance to help people who are trying to do the right thing and better themselves.
- Community meetings with Non-Profit and Corporate Entities
- Cost to develop and rent support are the biggest factors. Neighborhood opposition comes in third
- Mixed income properties or set-ups would be best in terms of community acceptance and longer-term affordability for the property owners.
- Thank you for developing this survey
- Expanding the income guidelines to include people who would be middle class but on the very bottom and bordering low-income.
- Pairing NHT Funds with tax exempt bonds and 4% low income housing tax credits would significantly leverage the benefits/uses of the NHT Funds
- I think there is a strong argument for focusing NHTF dollars to the major cities in TN, particularly Nashville, where affordable housing is such an urgent issue and where development costs are increasing rapidly. NHTF dollars would be crucial gap funding for mixed-income developments in Nashville.
- More information on available resources
- Please be sure to include accessible housing in locations that are not traditionally low income to allow access to resources not available in low income neighborhoods
- In order to support creating rental housing opportunities for households below 30% AMI, I believe these limited resources may be best applied to maximize sustainable residency by allocating them for households that are seeking ownership that are in the below 50% or below 80% AMI. Use the funds as a way to subsidize property taxes (in the absence of abatement) for a three year period to reduce ratio implications and thus "free up" existing stock access.
- It hard to get acceptance here I've been denied several time and I have 5 small kids and a single mother and it people like us that can't get help...
- Housing services need to be more expansive to assist with deposits and supportive services to include start up packages for residents for basic furniture and supplies. Youth aging out of foster care is becoming a big barrier for in finding housing for.
- Consideration for support services funding should be given to existing agencies who provide housing for the chronically homeless with or without income
- I believe the LGBT community is needing more housing options because of homelessness especially youth and young adults.
- Need for Adequate housing for homeless ex-offenders
- Affordable Housing needs to be available for Middle Class Residents
- "I am not looking for rentals. I need desperate help for home repairs. My home is not livable.
- Regarding rentals in the area I do not know of any."
- Not a lot of money state-wide; let's not make the competition too labor intensive for applicants
- Rental assistance for single moms with disabilities
- There should be more housing opportunities for people who earn \$50,000 or less, and more home grants for teachers, police, firemen, and other essential community helpers.

- There needs to be more assistance for the minimum wage worker who does not make "three times the rent" in income. Add a felony and poor credit, and their chances of finding housing is nearly impossible.
- We need some way to provide some Assisted Living Facilities for low income people in our county.
- We are concerned that people with eviction history from subsidized housing cannot get other subsidized housing even when they participate with intervention.
- The National Law uses 30% of Median or the Federal poverty Level. Tennessee should use this same language. These funds are particularly targeted to urban centers. Rural Areas will be left out!
- Rental housing and low income housing for special needs population needs to be preserved for Nashville.
- Dealing with my disabilities I can't live in places where it's a lot of crime I need a place I can afford to keep and help with my daughter cause she helps care for me and my income only pays the bills
- I live in Ridgely Tn. There is nothing productive for kids to do here and that makes a lot of negativity things happens here in this small community
- We need more permanent supportive housing. We also need housing for homeless youths either ageing of foster care or being kicked out of their homes when turning 18.
- Bridging gaps between private landlords and section 8 vouchers.
- Lack of affordable housing is causing families in shelters to disqualify themselves from help. Once families have used their time up in the shelter they then have to couch hop and this disqualifies them from help with HUD funds.
- Single family workforce housing is a huge need in Nashville. My clients are able to get on their feet after a voucher or some rent assistance is provided but there are not enough available units.
- Requiring victims of domestic violence to follow the same standard qualifications as a traditional homeless family does not take into consideration the unique circumstances of victimization. For example a victim of DV fleeing her abuser may have no access to the shared marital assets for months or even years, maybe never depending on the situation. They should not have to count it and be disqualified from assistance for it.
- Within urban areas, opportunities to invest funding in areas that are NOT high poverty areas are essential to families. Individuals and families also need to be connected to transportation and employment opportunities for upward mobility.
- People that do not have a job at all or are not honestly, and actively seeking employment should not be eligible. There are many part time jobs available to those in need and with assistance this could be efficient for those that are in need to get some experience to gain better or full time employment.
- Collaborate with existing apartment complexes to ensure tenants and future applicants are aware of available funds to help with rental supplemental payments. The majority of tenants already located in apartments are extremely low income and do not have available to them rental assistance. Qualify tenants already placed in apartment buildings as well as potential applicants for supplement by providing rental assistance to existing low income tenants.
- All of the PHAs and PSH providers have extremely long wait lists. Even if a unit becomes available, there is no permanent housing assistance to sustain the homeless, especially those lacking income or who have mental illness. We do not have any shelters for homeless families other than Family Promises and they have a waiting list, too; additionally, shifting from church to church is not a secure environment for children. We need family shelters and the funds to operate it.
- Elizabethton, Tn. has such a need for clean, affordable housing options; something that is not the unclean, unsafe, projects. This town is also in need of planning organization, we have residential and commercial all on the same street, and some of the worst apartment projects across from high dollar residential housing. This town needs more homes that are clean, safe and HUD approved specifically for single Mothers and their children

- There needs to be something done about how you apply when you apply the computer pick random people I don't think that's fair cause a lot of single mom need it more than most that gets pick. Some have multiple income but the ones in the lowest bracket get weeded out!!!! That's not fair!!!!
- Making the housing only for >30 AMI makes it extremely difficult for non-profits to operate the housing since it doesn't generate enough income to make the operations feasible. The non-profit has to make enough money to cover the cost of insurance, taxes, maintenance, and in some cases utilities and supportive services. If the only income on the housing is rent from tenants making >30% AMI it is not feasible. The only way this is possible is if there are housing vouchers but as you know these vouchers are very limited too difficult to acquire.
- I believe more property owners would make houses available for scattered site, tenant based vouchers if the lease/HAP/and certification paperwork was minimized. And/or the owner received more quality assistance from THDA
- Our community is suffering with the lack of affordable housing. We've proven that our families are living with 2 or 3 generations living under one roof. We have been deny any assistance by the COC in Cookeville because the FMR for Wilson County. It is significantly higher than most of the HART area because you are part of the Nashville metro area. Briefly, the FMR cannot be exceeded by the rent and utility allowance combined. The utility allowance is calculated based on the unit structure, # of bedrooms, and types of utilities (i.e. gas, oil, electric). In a nutshell, our main concern is if they can continue making rent payments after our assistance ends.
- I think our residents could maintain after assistance has been given. Because all would be require them to maintain budgeting classes, jobs and a close relationship with our agency. Success is what we strive for with our residences and we would do the same with those in our community.
- See Needs Assessment and Market Analysis sections of City of Murfreesboro's 2015-20 Consolidated Plan.
- Housing specifically geared towards larger homeless families 3 bedroom and up I see as the biggest need within Davidson County.
- Rents are rising rapidly, leaving more moderately low-income people to need housing subsidies. This makes it even harder for those extremely low-income people with the greatest barriers to housing to avoid homelessness.
- There are long waiting lists for public housing and Housing Choice vouchers. Those who have received vouchers are finding fewer and fewer properties willing to accept them. This is due to both low overall vacancy rates in the Nashville metro area, as well as investors buying low-income properties, making minor renovations. and increasing rents by 50% or more to accommodate the burgeoning population of young professionals wanting to live in the urban core.
- Those who are able to find a property that will accept their voucher face steep application, deposit, and other move-in costs.
- Although all of the low-income populations served by our non-profit are affected, we are seeing the biggest increase in potential homelessness among families.
- Not enough rental assistance.
- Poor credit history is often a barrier for my clients.
- Supportive services for at least 1 year are critical to this populations success and to property owners willingness to participate
- With the limited resource to the agency of this money, it will be difficult to put parameters on it that will funnel it to the right fit, as everyone will be clamoring for it to fit their specific needs. See where your housing data leads the need to be in TN, and first year target it to that specific target. As the program expands, you can make changes to include different types of housing. But for the initial program, set your sights on where your housing data leads you to be able to help the most Tennesseans, who otherwise would not be helped with housing, with this small portion of money. It would be a shame to see only 1 or 2 developments assisted annually.

- We are a rural area with very limited employment opportunities. We have a disproportionate number of individuals on disability and cannot afford to pay the deposits to move. Many are living in extremely crowded and dilapidated housing.
- The biggest need is just for more housing in general. Because of the rise in property values in Nashville, housing is difficult to find, even with a Section 8 voucher.
- We need more housing for ex-offenders whom changed their lives.
- It is disheartening to work with homeless individuals and to find out that there are empty HUD units waiting on 'construction' while people are freezing to death in our community. Also, there is no way that people with disabilities, illiteracy, mental illness could navigate a HUD property application without assistance. It is way too complex and a barrier for many people.
- It is so hard to find rentals without having to go thru so much red tape. Rentals in a "good" neighborhood are unaffordable for an average person making \$25,000 - \$30,000.
- I urge not to target special populations, as those applications can be funded within general populations, whereas VLI general populations need access to affordable housing also and they are overlooked
- I lived with my grandmother and she has all timers and her son took her to his house to take care of her left me at this house and it's four bedrooms and I like it and I have roommates
- Consideration should be given to tenant housing - upgrade some of the no longer used hotels and appoint someone to oversee these sites. There are many existing properties that could be renovated for those in need without the cost of totally building new sites and acquiring high cost property acquisition. Let's use what we have and make it work.
- In rural areas as ours I find that numerous folks that need homes have suffered a disaster - a lot of fires-tornados, straight line winds etc. They own property however have no funds to rebuild. I would love to discuss this issue if you would like to call.
- To develop a successful program, it's important, but often very difficult, to get all the critical pieces in place at the same time, connecting decent affordable housing with vouchers or subsidies and appropriate social services. Bringing online more of any of those components is great, but the best outcomes for the money happen when all three are part of an intentional plan.
- Hard for locals to get funding
- As an advocate I see first-hand the barriers that the clients I serve face. Long wait lists are a common occurrence. Many clients have a poor credit history or rental history due to many different circumstances. Residents end up living in housing that is not safe for them or their children.
- Creating safe supportive communities as a part of development.
- Families with children should have a higher priority than single individuals. Too many of them are having to live doubled-up with other families in overcrowded and unsanitary conditions to survive. These families don't even show up on HUD's radar, although they are among our most vulnerable.
- My answers are heavily swayed and/or limited to my focus on housing for individuals who have long durations of homelessness and have presenting mental health issues. I fully recognize that available housing for the extremely "poor" of all categories is a challenge worthy of addressing and responding. I have come convinced that the issue of homelessness is really about the lack, if not, the deprivation of housing. We have unfortunately approached "homelessness" from a pathological perspective instead of what it really is - the lack of housing. It is time to build, build, build! Thanks for the opportunity to share my opinions.
- There are issues in the application and scoring for tax credits that hinder new developers and not for profit providers becoming involved
- The cost of land and public transportation access are the main issues for low income families living in Nashville.
- While non-profit organizations and community developers perform great works to address the housing needs, a new program needs to be attractive enough to private developers to make affordable housing enticing enough for them to join the game. Otherwise, they serve as an antipode to any progress in this realm.

- People transitioning from mental health and/or substance use treatment facilities and jails (the new asylums) are often discharged to homelessness. In East Tennessee, with the closure of the state psychiatric hospital and the pre-existing lack of housing options, we see many people who have nowhere to turn and feel more desperate because of this situation.
- The profit margin is too small for developers to build "affordable" housing.
- People with disabilities have a very hard time finding appropriate housing that meets their needs within their budgets.
- I'm disappointed that THDA set up this program -- rental only for below 30% -- without consulting with community partners.
- Access to reliable transportation is essential as many people in these groups don't have cars or other reliable transportation to needed services. Most towns of any size have older buildings that could be rehabbed for some of these housing needs, such as vacant motels and hotels, and school buildings, that seem to end up as high dollar housing.
- Consider Rural Area's with same priority as our Metropolitan Cities in Tennessee. No set asides, please
- We need all the help we can get! Affordable housing is disappearing fast! And chronic homelessness is becoming the rule rather the exception in Rutherford county..
- Would there be assistance in terms of financial counseling and skill based training provided to the recipients? I think that is critical in making any housing assistance sustainable at the individual level.
- Roane County, TN. - Persons are being turned away from what little low income housing we have due to lack of employment, past evictions, criminal history, or no vacancies. We have many families or individuals moving in with persons they just met in order to get off of the streets. I recently talked with an elected official about the need for low income housing in Kingston. I was told look what it's done in Harriman and Rockwood and I don't want Kingston looking like that. We need low income housing assistance in our county that works with those who have had evictions, lack of income, or criminal histories.
- It is excellent to see the opportunity to develop affordable housing for the most economically vulnerable. It is my hope that communities with a disproportional lack of available affordable housing or overall high housing costs will be prioritized.
- The 37146 area is in much need of affordable rental housing, but the City Board members think rental housing is an eye sore. They are not educated in the fact that the need is high and has nothing to do with aesthetics.
- I have over heard some communities stating that they do not have resources to add infrastructure needed for large developments. Large Developments can over tax existing utilities, schools and other public services.
- THDA needs to do more outreach at the local level. Should make it mandatory to meet with elected officials, and work closer with smaller PHA's.
- Provide small group homes, boarding houses for mentally ill which are safe and support ongoing recovery in patients.
- Places are very rural, lack of a vehicle to travel
- It is much needed in this area.

If you would like to be contacted regarding your additional comment, please provide your contact information below.

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Latiki N. Pankey	Centerstone	Nashville	latiki.pankey@centerstone.org
Mario P Allen Jr	N/a	Murfreesboro/	901bhp528@gmail.com
Shavondra Hankieson		Clarksville	sjcibt@gmail.com
Barbara raper		Madisonville, Tn.	barbara.raper@outlook.com
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Melanie Cordell	TN Valley Coalition for the Homeless	Knoxville	mcordell@tvchomeless.org
Wanda Bowman		Lebanon	wbowman166@gmail.com
Tabetha J Thomas	Tabetha Thomas	Memphis	missjoytj@gmail.com
CAROL STEVENS	Nia Association	Clarksville	cccs4245@gmail.com
Joy Bobo-Beasley	Riverview Kansas Community Development Corp	Memphis	Riverviewkansascdc@gmail.com
Melissa Miller-Monie	S.O.L.I.D.s (Scope of Life Illuminates Destiny)	Memphis, TN	solidsnetwork777@gmail.com
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Rhonda Brewer			brewerhouse@yahoo.com
			rosalyn.willis@mccormackbaron.com
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Malcolm E Wilson	LeMoyné-Owen CDC	Memphis	mewilson09@gmail.com
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Robert Hyde	Alco Properties, Inc.	Memphis, TN	rhyde1@alcomgt.com
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Yolanda Mitchell	Urban Housing Solutions	Nashville TB	yolanda @urbanhousingsolutions.org
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Betsy Price	Case Management Inc.	Memphis	betsy.price@cmiofmemphis.org
Matt Okonofua	Shelby County Division of Corrections	Memphis	matt.okonofua@shelbycountyttn.gov
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no			
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Rebecca Tarango	Goodwill Industries	Nashville	rebecca.tarango@givegw.org
Patricia Basham	McMinnville Housing Authority	McMinnville	mmha@blomand.net
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Katie Banks	Helen Ross McNabb Center	Knoxville	Katherine.Banks@mcnabb.org

Name	Company	City/Town	Email
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Tammy Barnette	Century 21 Legacy	Elizabethton	tjbcent21@gmail.com
Michael White		Brush Creek	michaelwhite@dtccom.net
Teresa gordon	Operation Restoration	Portland	operationrestoration0@hotmail.com
Liz Reese	Brooks House	Lebanon	BH@brookshouse1.com
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n/a			
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Darlene Hendrix		Nashville, TN	ddhendrix1215@bellsouth.net
Rebecca Lopez	Urban Ministries	Clarksville TN	rebeccalopez@urbanministries.us
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Pearl Rich	Resident/A Place at the Table	Knoxville, TN	richpearl@hotmail.com
Andi Cline	The Experience Community Church	Murfreesboro	
Karin Landers	Humphreys County Long Term Recovery Organization	McEwen	karin.landern@att.net
Don Alexander	Crossville Housing Authority	Crossville	dra@crossvillehousing.org
Michael Dunthorn	City of Knoxville Office on Homelessness	Knoxville, Tenn.	mdunthorn@knoxvilletn.gov
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Buford Reed	Dickson Housing Auth	Dickson	booty@dicksonhousing..com
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			bessd@rcschools.net
Sherry Trent	Johnson City Housing Authority	Johnson City	SherryT@jchousing.org
Daryl Murray	Welcome Home Ministries	Nashville	welcomehomemin@comcast.net
C. Winston Henning	Jackson Housing Authority	Jackson	whenning@jacksonha.com
Tanya Rodriguez	TN Fair Housing Council	Nashville	tanya@tennfairhousing.org
Kim Snell	Rutherford County Schools	Murfreesboro	snellk@rcschools.net
Bruce Spangler	Volunteer Ministry Center	Knoxville	bspangler@vmcinc.org
William Kerley	Kerley Consulting and Development	Knoxville	william.kerley56@gmail.com
			James.Adkins@tn.gov
Sheryl McCormick		Knoxville TN	smccorm1@covhlth.com
Micah Wood	Volkert, Inc.	Franklin	micah.wood@volkert.com

Name	Company	City/Town	Email
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Steve Lockwood	Frayser CDC	Memphis	slockwood@fraysercdc.org
Jim Harbison	MDHA	Nashville	jharbison@nashville-mdha.org
Wm. Hershel Thrasher, Ex.Dir.	Shelbyville Housing Authority	Shelbyville, Tn.	whthrashersha@bellsouth.net
Eric Murry	A City of Grace	Murfreesboro	eric.murry@gmail.com
Jason bennett	Murfreesboro cold patrol	Murfreesboro	jason.murfreesborocoldpatrol@gmail.com
Sherith Colverson	City of Oak Ridge	Oak Ridge	scolverson@oakridgetn.gov
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Scott Foster	The Journey Home, Inc.	Murfreesboro, TN	ascottfoster@comcast.net
Ron Budynas	Wesley Housing Corp of Memphis Inc.	Memphis	ron.budynas@wesleyhousing.com
Rhonda Mosier	THDA	Ashland City	rmosier@thda.org
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Mary Nelle Osborne, Ed.D.	Peninsula, A Division of Parkwest	Knoxville	mosborn1@covhlth.com
L. Thomas Rowe	Murfreesboro Housing Authority	Murfreesboro	trowe@mha-tn.org
sharon mccure	community action network	springville	sharon_mcclurew@yahoo.com
Thom Amdur	Tennessee Developers Council	Washington	tamdur@dworbell.com

From: [Laralee Huguley](#)
To: [Kent Archer](#)
Subject: RE: CDBG Public Comment Reminder
Date: Friday, September 02, 2016 5:24:00 PM
Attachments: [image001.png](#)

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Hi Kent,

I'm sorry my comment is rolling in at the last minute.

I thought ya'll did a great job with the public meeting. It is reassuring that you, Brooxie, your team, and the advisory committee are constantly looking into the current systems and seeing how to improve.

My main comment, as voiced at the public meeting, revolves around the additional \$22 million to be distributed. While I do think that work-force development and innovative programs are great, they do not fit well within the primary goals of the CDBG program as I understand it. Therefore, I support the use of the funds for the Stanton sewer project and the Haywood County EMS Center.

Improvement of ambulance services in communities where there have been hospital closures are also important. I think you can further address that goal by funding down the line on Community Livability ambulance projects. The way those small private hospitals have been running recently, all of small hospitals are in danger of closure. If you were to try to create a new program under the pressure of the timeline to spend the money, you run the risk of many flaws and you don't have time to run a pilot program at this point.

We are helping a community with their Drive to 55 application, and I think it will be difficult to execute their projects under the HUD/CDBG guidelines. Especially since that program already has a great deal of funding, that money would be best spent by staying within the CDBG program. I suggest those funds be spent to fund down the line for both 2016 CDBG applications AND 2017 CDBG applications. For those who were not eligible to apply in 2016, you should give them a shot at the money too in 2017.

Let me know if you have any questions about my comments. Thanks for all ya'll do! Have a great labor day weekend.

Laralee Huguley
Project Manager
Community Development Partners, LLC
P.O. Box 210437
Nashville, TN 37221
Phone: 615-386-0222
Fax: 615-386-0403



From: Kent Archer [mailto:Kent.Archer@tn.gov]

Sent: Friday, September 02, 2016 8:58 AM

Subject: CDBG Public Comment Reminder

Good morning,

I would like to remind everyone that today is the last day for comments and suggestions concerning the upcoming 2017 CDBG application round and the use of the balance of unexpended funds. As a reminder, you can find the presentation that addresses ECD's proposals here <http://tn.gov/ecd/topic/cdbg-community-development-regular-round>.

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Kent Archer | CDBG Director
Rural Development
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(615) 354-3591
kent.archer@tn.gov
<http://tn.gov/ecd/section/community-grants>

From: [TOMMY GREEN](#)
To: [Kent Archer](#)
Subject: Re: CDBG Public Comment Reminder
Date: Friday, September 02, 2016 4:18:44 PM
Attachments: [image001.png](#)

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My comment is regarding the proposed uses of previously unallocated CDBG funds. I am recommending that you keep the proposal to fund Brownsville and Stanton, but please consider using the reminder the CDBG funding to fund pending 2016 CDBG applications in all categories.

Mayor Tommy Green

On Fri, Sep 2, 2016 at 8:58 AM, Kent Archer <Kent.Archer@tn.gov> wrote:

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Kent Archer | CDBG Director

Rural Development

Tennessee Department of Economic and Community Development

312 Rosa L Parks Ave., 26th Floor, Nashville, TN 37243

kent.archer@tn.gov

<http://tn.gov/ecd/section/community-grants>

From: Megan Farris Choate [<mailto:mchoate@ucdd.org>]

Sent: Friday, September 02, 2016 9:37 AM

To: Kent Archer

Subject: RE: CDBG Public Comment Reminder

*** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. ***

Good morning Kent,

Since we didn't have a large representation of local elected officials at the meeting we decided to put your questions on the unexpended funds into a short survey and send to a few of our more active mayors.

Here is a link to their responses

<https://www.surveymonkey.com/results/SM-3X6TKDGM/> (let me know if the link doesn't work)

There was strong support for adding the extra funds to the regular round, workforce, LiftTN and Asset-based planning/Retail Academy, but strong opposition to the programs surrounding the MRM.

My recommendation surrounding industrial programs as a compromise would be to consider contributing funds to the largest sites in each region. That would allow you to contribute funds to MRM but also the Plateau

Partnership Park or Clarkrange Business park in the Upper Cumberland - I'm sure there are large developments in East and Middle that I don't know the names of!

I do agree that this is your chance to do something special and not just fund the list of water/sewer projects that as Brooxie stated will never be fulfilled.

I strongly support the division of sewer project funding! My opinion is that \$300 for community livability is probably still enough for now. I would support a change either way, but if it was increased I would consider increasing it to \$400,000 or somewhere in between - leaving sewer and water available for the most funding.

I'm sorry if this email is choppy or hard to follow, I'm having to rush out of the office. Thank you for the great meeting last week and the opportunity to provide feedback!

Megan

From: Kent Archer [<mailto:Kent.Archer@tn.gov>]

Sent: Friday, September 02, 2016 8:58 AM

Subject: CDBG Public Comment Reminder

Good morning,

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addresses ECD's proposals here <http://tn.gov/ecd/topic/cdbg-community-development-regular-round> .

Thank you to everyone who attended the public meetings this year.

When all was said and done, we had about 150 attendees between all 3 public meetings. Expanding the meetings to each grand division led to better turnout from local officials

and stakeholders and better discussions surrounding our proposals.

From: [Ken Rea](#)
To: [Kent Archer](#)
Cc: [Susan Reid](#); [Gray Stothart](#); llowery@ftdd.org
Subject: RE: CDBG Public Comment Reminder
Date: Friday, September 02, 2016 10:38:57 AM
Attachments: [image003.png](#)
[Public Meeting Comments 8-24-16.docx](#)

Kent:

Please see the attached public comments from the First Tennessee Development District and also from local government officials in the region. Please let me know if you have any questions.



Ken Rea
First Tennessee Development District
Northeast Tennessee Economic Development Corporation
3211 N. Roan St.
Johnson City, TN 37601
423/722-5098

From: Kent Archer [mailto:Kent.Archer@tn.gov]
Sent: Friday, September 02, 2016 9:58 AM
Subject: CDBG Public Comment Reminder

Good morning,

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Kent Archer | CDBG Director

Comments from the August 15, 2016 CDBG Public Meeting in Farragut

By First Tennessee Development District with Input from Local Elected Officials

ECD Proposed Change: Split sewer system applications into 2 funding pools; WWTP and System.

OPINION: This would be a good change. System projects, including I/I projects, have been discouraged in previous years because they would not compete well against projects dealing with treatment plant improvements adjacent to 303D streams. This method will allow more CDBG funding to go towards system projects, a major issue with municipalities.

ECD Proposed Change: Some potential changes centering on incentives for preliminary sewer system work are not in the cards for the 2017 funding round, but are still under consideration for 2018 and beyond:

- 1. Small grants for televising sewer lines and equipment to monitor flow.**
- 2. Reduced ATP (ability to pay).**
- 3. Additional points awarded to applicants who have plans for maintenance and repair.**

OPINION: Items 1 and 3 are valid attempts to make down-the-road projects more efficient by targeting the worst problems that are known before the application is submitted. However, technology and cost advances are making it less expensive for small utilities to buy TV equipment and do their own work. Portable flow meters are improving in accuracy and are decreasing the need for the more expensive in-line flow meters. The need for these items may decline over time. Most municipalities that we work with have some type of plan for line rehab projects, so that shouldn't be a problem.

ECD wants to reduce the number of scope changes being implemented for line extensions. Ms. Carlton indicated that ECD is considering a requirement to have beneficiaries make some sort of written commitment to hooking up to the new line prior to submission of the application.

OPINION: You bring up a valid problem without an easy solution. Of the last three water line projects that FTDD worked on, one had fewer customers, one had the exact number of customers, and one had more customers than in the application. Predicting what would happen wasn't possible. Although there are target area residents who will state their intention to hook up when the survey is being performed and then change their minds after the grant has been awarded (thus creating the need for a scope change). There are other situations that a preliminary commitment cannot resolve. One common problem involves rent tenants. When the application is being developed, they are living in the target area and want to hook up. But when the time comes to run the lines, the eager-for-water/sewer tenants have moved and the house may be vacant or even demolished. With time, the occupants of the dwelling units in the target area WILL change. Having someone sign a commitment prior to the application does not prevent them from moving or dying.

ECD asks if the \$300,000 CDBG maximum is large enough for community livability projects.

There are certain projects such as a health department application and a county-wide fire department project that would benefit from more than \$300,000.

ECD is questioning whether or not TDEC's priority list matches actual local needs. It was noted that TDEC's priority list is driven by federal and state regulations (303 (d) impaired streams, etc.) rather than by difficulties experienced by local operators of sewer collection and treatment.

OPINION: The TDEC Priority List places a premium on 303(d) streams to the extent that non-303(d) stream projects do not score very well.

ECD asks if a new scoring system is needed for housing projects.

OPINION: There is not a big problem with the existing scoring system for CDBG housing applications. The problem with CDBG-funded housing rehab has to do with the requirement that all benefiting housing units must be within a contiguous area. There is a substantial need for housing rehabilitation in several northeastern Tennessee communities. CDBG funds cannot be requested to benefit these families because the low-income, owner-occupied, houses needing work are scattered, not concentrated.

Ms. Carlton noted that for a sewer system, even when outfall does not go to a 303 (d) impaired stream, if overflow is ending up in a 303 (d) impaired stream, this situation should be documented to TDEC and in the application, and the project will be more likely to be funded (receive more points).

Ms. Carlton said that there is currently \$21.89 million in unused CDBG funds, and this would never happen again. So, they want to apply these funds to INNOVATIVE CDBG projects that support ECD's mission and long-term objectives.

OPINION: While some of the items below make sense, consideration should be given to trying to place more of the \$21.89 million back into the CDBG pool so that the percentage of applicants funded is higher than 40%. There are a lot of good projects that do not get funded in the regular round that would benefit from a larger pool.

1. **\$3.5 million will be added to the 2016 regular round projects IN TIER 4 COUNTIES (which are Hancock, Johnson, Unicoi, and Carter in our region).** *OPINION: Agree with recommendation.*
2. **Proposed: \$1,000,000 for expansion of the Lift Tennessee Microenterprise program to assist LMI entrepreneurs.** *OPINION: Do not know enough to see if it will benefit Northeast TN communities.*
3. **\$10,000,000 for Workforce Development that aligns with the Drive to 55 Capacity Building Fund initiative.** *OPINION: Do not know enough to see if it will benefit Northeast TN communities.*
4. **\$1,000,000 for support of communities that have had hospital closures.** *OPINION: Even though it doesn't affect Northeast TN counties, the need is understood.*
5. **\$1,000,000 for owner-occupied housing rehabilitation for Project 95.** *OPINION: Based on previous HOME projects, there is definitely a lot of housing rehab need in Hancock County.*

6. **\$2,000,000 for rehabilitation and diversion of the Stanton sewer system.** *OPINION: Not sure of why community is separated out for additional funds.*
7. **\$3,000,000 to assist with construction of EMS center to serve southwest Haywood County region and MRM.** *OPINION: Not sure of why community is separated out for additional funds.*
8. **\$500,000 for asset-based planning and Retail Academy.** <http://retailacademy.us/> *OPINION: Do not know enough to see if it will benefit Northeast TN communities.*

From: [Chuck Hammonds](#)
To: [Kent Archer](#)
Subject: RE: CDBG Public Comment Reminder
Date: Friday, September 02, 2016 9:51:55 AM
Attachments: [image001.png](#)

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Below are my comments:

1. Haywood County and Stanton not be allowed to participate in the additional \$3,500,000 in funding to 2016 Tier 4 counties since they will both receive \$3,000,000 and \$2,000,000 respectively.
2. For cost per LMI, use the county LMI% and/or city LMI% depending on the local jurisdiction applying. (We talked about this at ARC)
3. Allow the SETDD the opportunity to assist ECD in scoring the projects. 😊

That is really all I have. Thanks for the opportunity to comment.

From: Kent Archer [mailto:Kent.Archer@tn.gov]
Sent: Friday, September 02, 2016 9:58 AM
Subject: CDBG Public Comment Reminder

Good morning,

I would like to remind everyone that today is the last day for comments and suggestions concerning the upcoming 2017 CDBG application round and the use of the balance of unexpended funds. As a reminder, you can find the presentation that addresses ECD's proposals here <http://tn.gov/ecd/topic/cdbg-community-development-regular-round>.

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Kent Archer | CDBG Director
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(615) 354-3591
kent.archer@tn.gov
<http://tn.gov/ecd/section/community-grants>

From: [Gwendolyn w Brown](#)
To: [Kent Archer](#)
Subject: Re: CDBG Public Comment Reminder
Date: Friday, September 02, 2016 9:42:04 AM

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Kent, I am thinking that the funds should be used for system improvements. Based upon the number of applications received this year, there is definitely a need. The impact is greater benefiting more people, particularly those who are LMI. Additionally, longevity is a factor as well--more sustaining over time.

I also think that the community livability category should be raised from \$300,000 to \$400,000. With local match, the totally could easily be \$450,000 to \$500,000.

I am finding that most of my clients in communities are allocating at a minimum \$125,000 as local match on most system projects. This far exceeds the ability to pay index for that community. They are generally addressing a problem that is subject to TDEC findings.

Most communities just need an incentive of grant funds to justify the need with most councils and commissioners.

I do like that the public meetings were held regionally.

Hope this is helpful.

Sent from Gwendolyn Brown's iPhone

On Sep 2, 2016, at 9:58 AM, Kent Archer <Kent.Archer@tn.gov> wrote:

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<image001.png>

Kent Archer | CDBG Director

From: [Melissa Davis](#)
To: [Kent Archer](#)
Cc: [Joe Barker](#)
Subject: RE: CDBG Public Comment Reminder - Possible project..
Date: Friday, September 02, 2016 10:37:53 AM
Attachments: [image001.png](#)

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Good Morning Kent,

Hardin County is interested in seeing if the unexpected workforce development funds could be used to do renovations to their library which also serves as a place public space where residents can utilize computer space to look for employment etc.

Thank you and have a wonderful Labor Day weekend!

Melissa

From: Kent Archer [mailto:Kent.Archer@tn.gov]
Sent: Friday, September 02, 2016 8:58 AM
Subject: CDBG Public Comment Reminder

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(615) 354-3591
kent.archer@tn.gov
<http://tn.gov/ecd/section/community-grants>

From: [Mayor Bill Rawls](#)
To: [Brooxie Carlton](#); [Kent Archer](#)
Cc: ["Almeta Ellis"](#)
Subject: City of Brownsville's Suggestion for the proposed 2017 CDBG Funding
Date: Friday, September 02, 2016 10:25:50 AM
Attachments: [CDBG Letter 8312016.doc](#)

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Good morning,

Attached you will find the proposed suggestions for the 2017 CDBG Funding year. We do appreciate the concern of Rural Development towards our thoughts on this matter.

Best Regards,

William D. Rawls, Jr.
Mayor
City of Brownsville
111 N. Washington Avenue
Brownsville, TN 38012
731.772.1212



WILLIAM RAWLS, JR., MAYOR

111 N. WASHINGTON AVENUE•P.O. BOX 449•BROWNSVILLE, TN 38012
(P) 731.772.1212 (F) 731.772.1275

September 1, 2016

Brooxie Carlton
Rural Development
Tennessee Tower, 26th Floor
312 Rosa L. Parks Ave., Nashville, TN 37243

Dear Brooxie:

We were represented at your recent public meeting. While we support and respect all of the efforts from the Rural Development Department, however, funding is limited for our small towns in the area infrastructure, community livability, and housing. I support the proposed allocation of \$2,000,000 for Stanton Sewer and 3,000,000 for Haywood County EMS. As such, it would be in the best interest of our city, and similar cities, for the Rural Development Division to use more of the surplus CDBG funding to fund down the list of applicants for 2016 and the upcoming 2017 CDBG Small Cities Applications.

Respectfully,

William D. Rawls, Jr.
Mayor

VICE MAYOR:LEON KINGALDERMEN: JOHN SIMMONS•CAROLYN FLAGG•THOMAS AVERYHEART

From: [Cathy Andrews](#)
To: [Kent Archer](#)
Cc: [Brooxie Carlton](#)
Subject: CDBG Public Hearing Comments
Date: Friday, September 02, 2016 10:21:49 AM
Attachments: [image001.png](#)

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Dear Kent ,

Below are my comments:

- Pertaining to cost per LMI, please use the jurisdiction LMI percentage for scoring. For example if, Niota, TN is applying for a CDBG, please use Niota's LMI percentage, not McMinn County's LMI percentage.
- Pertaining to the 10 million additional dollars in CDBG that is proposed for Workforce development , cut the workforce development proposal down to 8 million or 7.5 and allow for 1 or 2 innovative demonstration projects per grand division. Perhaps up to \$500,000 per project.. Look in the areas of affordable housing, Brownfield redevelopment , senior affordable housing, adaptive reuse of properties for community revitalization . After all, this is CDBG , HUD money.
- Haywood County and Stanton not be allowed to participate in the \$3,500,000 for additional regular round funds.

Best Regards,

Cathy Andrews

Southeast Tennessee Development District

From: Kent Archer [mailto:Kent.Archer@tn.gov]
Sent: Friday, September 02, 2016 9:58 AM
Subject: CDBG Public Comment Reminder

Good morning,

I would like to remind everyone that today is the last day for comments and suggestions concerning the upcoming 2017 CDBG application round and the use of the balance of unexpended funds. As a reminder, you can find the presentation that addresses ECD's proposals here

<http://tn.gov/e cd /topic/cdbg-community-development-regular-round>.

Thank you to everyone who attended the public meetings this year. When all was said and done, we had about 150 attendees between all 3 public meetings. Expanding the meetings to each grand division led to better turnout from local officials and stakeholders and better discussions surrounding our proposals. Thank you again for being part of making our and your CDBG program better.

From: [Matt Von Lunen](#)
To: [Kent Archer](#)
Subject: GNRC Public Comments Regarding CDBGs
Date: Thursday, September 01, 2016 4:55:59 PM
Attachments: [GNRC FY 2017 CDBG Public Comments.pdf](#)

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Kent,

Our public comments are attached.

Good job with getting 3 meetings together and working toward some positive change.

Thanks,

Matt Von Lunen
Greater Nashville Regional Council
Planning, Research, & Development Division Administrator
501 Union St. 6th Floor
Nashville, TN 37219
(615) 862-8849

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From: [Brooxie Carlton](#)
To: [Randy McKinnon](#)
Cc: [Kent Archer](#)
Subject: Re: Propose use of unexpended funds/general comments
Date: Tuesday, August 30, 2016 8:49:15 PM

Thank you for the comments.
Brooxie

Sent from my iPhone

On Aug 30, 2016, at 5:55 PM, Randy McKinnon <r.mckinnon@tlmae.com> wrote:

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<!--[if !supportLists]-->● <!--[endif]--> \$10,000,000 -
Workforce development that aligns
with the Drive to 55 Capacity
Building Fund initiative

We worked with Chester County last year to propose an expansion of their Higher Education Facility. The building was built near the industrial park around 5 years ago and has been used for Adult Ed and various training of industrial employees. They have been approached by area industries and have expressed a need to expand the building to include a welding and metal fab certification shop and we have done a preliminary plan for this expansion. I'm not sure we did a budget but I would expect the project to be less than \$500,000. They would like to request that this project be considered for funding with the available Workforce Development funds.

<!--[if !supportLists]-->● <!--[endif]--> Is \$300K for
Community Livability enough?

Our experience with CL grant funds for new buildings is that this is absolutely not enough. I cannot think of one project that did not require funding from multiple sources (often more than 2). These project turn into very difficult design jobs that have to meet multiple grant requirements and are very frustrating to the owner. I would suggest fewer grants available at the \$500,000 level.

<!--[if !supportLists]-->• <!--[endif]-->New ability to pay index (ATPI)

I agree with the change in ability to pay, requiring everybody to participate, even if at the 10% level. While we have worked with a few communities that received 100% funding, I feel like this is fair way to stretch grant dollars to other projects.

<!--[if !supportLists]-->• <!--[endif]-->Split sewer system applications into 2 funding pools

Good move as long as the I/I projects are scored in a manner that allows good projects to qualify. There have been many communities that have identified sewer overflows due to I/I that do not discharge directly into a 303d listed stream. A manhole that overflows on to a school yard, back yard, or into a public street should be an eligible project. I would like to see I/I projects scored similar to water loss projects. Higher identified I/I = higher score. This would require communities to complete some flow testing to complete an application, but this was discussed also. Another related good move in my opinion.

Randy McKinnon, PE
President

TLM LOGO



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www.tlmae.com

Connect with us:



From: [Brooxie Carlton](#)
To: [Joe W Barker](#)
Cc: [Kent Archer](#); [Melissa Davis](#)
Subject: Re: McNairy County
Date: Tuesday, August 30, 2016 8:43:33 PM

We would consider that. We'll be in touch when we're developing the guidelines.
Thanks,
Brooxie

Sent from my iPhone

On Aug 30, 2016, at 4:58 PM, Joe W Barker <jwbarker@swtdd.org> wrote:

Hey guys.....Mayor Brooks of McNairy County has asked if an application to assist in funding an EMS Center would be allowable under the CDBG funds made available to counties with hospital closures. Thanks.

Joe

From: [Brooxie Carlton](#)
To: [Allan Sterbinsky](#)
Cc: [Kent Archer](#)
Subject: Re: Workforce development grant
Date: Monday, August 29, 2016 10:38:50 AM

Hi Mayor,
We will let everyone know the process when we get through the public comment period and figure out how the money will be spent. It will likely be a few months.
Thanks,
Brooxie

Sent from my iPhone

> On Aug 29, 2016, at 11:19 AM, Allan Sterbinsky <allan.sterbinsky@gmail.com> wrote:
>
> Brooxie,
>
> As part of the \$22 million, I would like to submit two grant proposals. One is the \$50,000 local funds needed for the DRA \$50,000 matching funds for Career Ready (ACT NCRCertificate program) in Haywood County. I also have another grant idea I would like to submit.
>
> What process should I use to have these considered as part of the \$10 M. Workforce development funds?
>
> Allan
>
>
> --
> Allan Sterbinsky Ph.D.

From: [Brooxie Carlton](#)
To: jmansfield@sctdd.org
Cc: [Nathan](#); [Lorie Fisher](#); [Kent Archer](#)
Subject: Re: unexpended CDBG funds
Date: Friday, August 26, 2016 2:08:04 PM

Thank you for your feedback.

Brooxie

Sent from my iPhone

On Aug 26, 2016, at 1:38 PM, Jerry Mansfield <jmansfield@sctdd.org> wrote:

Brooxie,

SCTDD supports the use of the unexpended CDBG funds to enhance workforce development and this grant opportunity could be used towards updating additional equipment for TCAT-Shelbyville and TCAT-Hohenwald Industrial Maintenance Programs. The expansion of this program is needed to meet the high skills required by industry in our area. The purchase of the equipment and training provided will result in a highly-skilled workforce to enhance manufacturing job retention and recruitment in Southern Middle Tennessee.

Thanks for your consideration,

Jerry

From: [Brooxie Carlton](#)
To: [Allan Sterbinsky](#)
Cc: [Kent Archer](#)
Subject: RE: Unexpended CDBG Funds - Public Comment
Date: Thursday, August 25, 2016 6:06:42 PM

Thank you so much for your feedback and support!

Brooxie

From: Allan Sterbinsky [mailto:allan.sterbinsky@gmail.com]
Sent: Thursday, August 25, 2016 1:18 PM
To: Brooxie Carlton
Subject: Unexpended CDBG Funds - Public Comment

Brooxie,

Thank you for meeting with us at the West Tennessee CDBG public meeting at SWTDD last week. The proposed use of the unallocated funds is strategically focused on what we need in Tennessee. The \$10 Million for Workforce Development is essential for preparing TN citizens for the jobs that will come in the future. It will also provide Tennessee with a competitive workforce, which is needed to attract new businesses to our state. I am proud of the focus you placed on these funds, and am fully supportive of your efforts.

Closer to home, I am appreciative of the \$3 Million allocated for Southwest Haywood County and the Memphis Regional Megasite. As you know, the hospital in Haywood County closed, making the MRM a bit less attractive to potential businesses. However, allocating these funds for an EMS Center helps address that issue, ensuring we can provide prompt medical and emergency services to any businesses that relocate to the Megasite.

Finally, I want to express my gratitude for allocating money for the rehabilitation and diversion of the Stanton sewer system. Stanton is glad to work with the state in helping ensure the wastewater treatment facility at the MRM functions at optimal efficiency. We hope this project will be a win-win agreement for both Stanton and the MRM.

Thank you so much for your vision for Tennessee and using these funds to further the strategic vision of the entire state.

Allan Sterbinsky
Stanton Mayor

--

Allan Sterbinsky Ph.D.

From: [Matt Von Lunen](#)
To: [Kent Archer](#)
Subject: CDBG Updated Scoring Clarification
Date: Thursday, August 25, 2016 11:43:08 AM

Kent,

I just wanted to doublecheck something regarding one of the changes from 2016.

I understand using the county LMI% for the cost per LMI calculation for county applications, but does that also include for town/city applications too? For example, is the City of Westmoreland's cost per LMI calculation going to depend on Sumner County's LMI percentage?

Thanks,

Matt Von Lunen
Greater Nashville Regional Council
Planning, Research, & Development Division Administrator
501 Union St. 6th Floor
Nashville, TN 37219
(615) 862-8849

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From: tsmith@cityofsavannah.org
To: [Kent Archer](#)
Cc: [Brooxie Carlton](#); [Garry Welch](#)
Subject: Questions - CDBG Public Meeting
Date: Wednesday, August 24, 2016 4:22:08 PM

Kent, after reviewing grant opportunities internally from that discussed in the CDBG public meeting, I have the following questions:

- 1) There was mention of smaller grants for flow monitoring, TV camera inspection, etc. for I/I. Are these smaller grants separate from the regular round applications or to be inclusive with a regular round application? If separate, does this type of smaller application then exclude a City from also applying for a regular round application?
- 2) If a City applies for one of the proposed workforce development grants (\$22 million), does this then exclude them from submitting a regular round application at the same time? If the workforce development grant application was a joint City/County application, could the City also submit a regular round application?

Just a couple of questions for clarification.

Thanks, Tom

Thomas L. Smith
Project Manager
City of Savannah
140 Main Street
Savannah, TN 38372
Tel: (731) 925-3300 ext. 156
Fax: (731) 926-1130
E-mail: tsmith@cityofsavannah.org

From: [Lee Thornton](#)
To: [Kent Archer](#)
Subject: 2 questions about application 2017
Date: Wednesday, August 24, 2016 10:25:06 AM

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Kent,

Morning. Wanted to get some clarification on 2 things for next year's applications from the meeting last week.

For the slide that says "Use County LMI % for Cost per LMI" - do you mean we will use the city or county LMI % by census for cost per LMI person calculation?

And, to the splitting up of I/I and Plant work: if we had a community that wanted to do both still, would there be a mechanism for that like normal or are we having to do one or the other. Will there be a place on the app to check "both"?

Thanks in advance for the info.

Thanks,

Lee

A handwritten signature in blue ink, appearing to read "Lee Thornton", with a long horizontal stroke extending to the right.

From: [Brooxie Carlton](#)
To: [Melissa Davis](#); [Kent Archer](#)
Cc: [Joe Barker](#); [Jimmy Sain](#)
Subject: RE: Proposed use for Unexpected Funds
Date: Tuesday, August 23, 2016 10:23:51 AM

Thank you for this input. It would definitely be an interesting project.

Brooxie

From: Melissa Davis [mailto:mdavis@swtdd.org]
Sent: Tuesday, August 23, 2016 10:09 AM
To: Kent Archer; Brooxie Carlton
Cc: Joe Barker; Jimmy Sain
Subject: Proposed use for Unexpected Funds

Brooxie & Kent,

I have had an inquiry into a proposed use of a project under the \$10M in Workforce Development funds. Mayor Jimmy Sain with Hardeman County (which is a Tier 4 County) is looking for funds to aid in the Development of a STEM Center/Educational Center at the new 4H Facility. Many schools are utilizing the 4H Facility, however there are no areas to have actual classes. We hope this potential project could be considered as fundable under the Workforce Development funds.

Thank you so much and have a blessed day!

Melissa Davis

Economic & Community Development Grant Writer

Southwest Tennessee Development District

102 East College Street

Jackson, TN 38301

731.668.6417

731.668.6421 (fax)

mdavis@swtdd.org

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From: [Casey Smith](#)
To: [Kent Archer](#)
Subject: Public Hearing info clarification
Date: Monday, August 22, 2016 11:56:17 AM

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Kent,

The slide for 2017 applications that listed the deadlines below is referring to regular round 2017 only?

- **Applications due February 24, 2016**
- Public Meetings must be held by January 24, 2016
- Closeouts due February 10, 2016
- Final RFPs due February 3, 2016
- Final change orders due January 27, 2016
- TDEC Priority List letters due January 20, 2016

Will communities lose eligibility for funding considerations for the proposed uses for unexpended funds if those applications are due in the winter and they have a current regular round or disaster grant still open?

Example - Hardin County has a regular round 2014 grant open that we plan to close by these deadlines so they can apply for the next regular round. When the grants for the unexpended funds are rolled out would Hardin County be eligible to apply if they are also applying for the next regular round?

Also, if McNairy County's 2012 disaster grant is not closed out until March we understand they will not be eligible to apply for the next regular round. But if the grants for the unexpended funds are rolled out during this time can they apply?

Thank you -

Casey Smith

Community Development Grant Administrator

Southwest Tennessee Development District

102 E. College St.

Jackson, TN 38301

Phone: (731) 668-6412

Fax: (731) 668-6421

csmith@swtdd.org

<http://www.swtdd.org>

From: [Lottie Ryans](#)
To: [Brooxie Carlton](#)
Cc: [Kent Archer](#)
Subject: RE: unexpended funds
Date: Friday, August 19, 2016 7:26:09 AM

Thank you for your quick reply. We have several programs in the pipeline that could use a boost of funds. All that we do serves students in all 8 counties of upper Northeast Tennessee so the reach is great.

We are pursuing Work Ready Community which requires funding for the National Career Readiness Certificate licensing and testing.

We are developing a Regional Work Ethic Diploma which will require funding for administration, program development , cords etc.

We are hosting an interactive career fair in March that we need funding to assist school systems with transportation costs. Additionally there are resources provided to counselors and teachers with career information including job descriptions, education and training requirements and, base salary information that need to be developed.

There are also capital needs in terms of equipment upgrades and new equipment that could be placed in our high schools for CTE programs that lead to certifications as well.

I look forward to hearing how opportunities unfold.

From: Brooxie Carlton [mailto:brooxie.carlton@tn.gov]
Sent: Thursday, August 18, 2016 4:39 PM
To: Lottie Ryans
Cc: Kent Archer
Subject: RE: unexpended funds

Hi Lottie,

Good to hear from you.

Honestly, what you mention below is about all of the detail that we have right now. We are proposing to use the funds as you mention below. We are collecting comments on our proposal now and when we get all of those in, we'll know better about how we are moving forward.

Let us know if you have suggestions on how this could help your communities.

Thanks,

Brooxie

From: Lottie Ryans [mailto:lryans@ftdd.org]
Sent: Thursday, August 18, 2016 2:33 PM
To: Brooxie Carlton
Subject: unexpended funds

Good afternoon. I have recently joined the staff of the First Tennessee Development District as Director of Workforce Initiatives after retiring from a 32 year career in the communications industry. The goals of my work at the District include developing Pathways TN, driving initiatives

that improve our workforce across all 8 counties (in partnership with AB&T/Workforce Development Board) and literacy to name a few. We work to bring opportunities to our middle and high school students recognizing the new WIOA laws are for “ out of school youth”.

The reason I am reaching out to you is based on something one of my coworkers heard in a CDBG public meeting. I understand there may be \$10,000,000 in unexpended funds that can be used for workforce development aligning with the Drive to 55 Capacity Building Fund Initiative. I am writing to see who I might contact to find out more information and to see if any of our current or planned work might qualify for funding.

Thanks in advance for your assistance.

Lottie Ryans

Director of Workforce Initiatives

First Tennessee Development District

3211 N. Roan Street

Johnson City, TN 37601

P: (423) 722-5101

F: (423) 928-5209

www.ftdd.org



CDBG Substantial Amendment Comments and Responses

The following are the comments received by ECD that were submitted during the 30 day public comment period for the proposed use of unexpended funds. Below is the summary that was put out for public comment and the comments and questions along with response from ECD. If a comment was received multiple times, it will only be listed once with the number in parenthesis to denote the number of times it was received.

The State of Tennessee Community Development Block Grant (CDBG) program has historically allocated the grant funds to eligible non-entitlement local governments for community development improvements including water and sewer infrastructure, public facilities, owner-occupied housing rehabilitation, and commercial façade improvements. Until the past few years, CDBG funds were also used for economic development loans. Through a process of reconciliation of grants funds an unexpended balance of \$22 million has been determined to be available for allocation. \$4 million was used to fund additional projects in from the 2016 regular CDBG application round. TNECD is proposing the following uses for the remaining balance of funds.

- *\$1,000,000 to be used for rural microenterprise assistance. Microenterprises are considered to be businesses of five (5) or fewer employees including the owner(s).*
- *\$10,000,000 to be used for workforce development in rural Tennessee. These funds will be used to fund additional TCATs in rural areas that applied for the Drive to 55 Capacity Building Fund grant.*
- *\$2,000,000 to be allocated as a one-time use of funds to rehabilitate and reroute the Stanton Wastewater Treatment System.*
- *\$2,500,000 to be allocated as a one-time use of funds for the construction of an EMS facility in the southwest area of Haywood County.*
- *\$1,000,000 to be used for Project 95. Funds will go toward the construction of a facility to create jobs in Hancock County.*
- *\$200,000 to be used for the Asset-Based Planning initiative that will assist counties to identify, enhancement, and maximize their assets.*
- *\$300,000 to be used for a Retail Academy that will assist communities in developing and implementing plans and strategies to recruit and grow retail businesses.*
- *\$1,000,000 to be allocated for the use of unmet recovery needs in Sevier County and a result of the November, 2016 wildfires.*

Comment: Will the workforce development funds be distributed via competitive grants?

Response: *The proposed method of distribution is to use the scored list of applicants of the Drive to 55 Capacity Building competitive application round to fund the unfunded TCATs in CDBG eligible locations in order.*

Comment: The unexpended funds should be used to fund water and sewer infrastructure project.

Response: *\$4 million of the unexpended funds were used to fund additional projects from the 2016 CDBG regular round. Additional projects were funded under water and sewer infrastructure categories as well as community livability. While we recognize the need for water and sewer improvements in Tennessee, we also regularly hear comments about the need for economic*

development in our rural areas. Using the remainder of the unexpended funds allows us to address these needs without impacting the traditional CDBG program.

Comment: My county is working on its healthcare needs, and a portion of that is the need for ambulances and a service center. Will the unexpended funds be eligible for these projects?

Response: The proposed uses do not include ambulances or service centers. These types of projects are eligible under the CDBG regular round. The use of these funds will be to assist with economic development and strategic planning in rural areas and to assist in the disaster relief of Sevier County.

Comment: My community is considering building a water treatment plant. Will the unexpended funds be eligible for this use?

Response: The proposed uses do not include the construction of water treatment plants as an eligible use. These types of projects are eligible under the CDBG regular round. The use of these funds will be to assist with economic development and strategic planning in rural areas and to assist in the disaster relief of Sevier County.

Comment: The only fair thing to do would be proceed down the list of applicants from the last grant application and award grants to the applicants that were next in line based on your rating system. If after these applicants are awarded and there is funds left, then you could do these other projects.

Response: ECD views these funds as an opportunity to make an impact in economic development, in addition to the community development impact it makes with the regular round CDBG funds. The ability to use CDBG funds to increase workforce development and enhance and implement strategic community planning is unique opportunity that may not be afforded in the future.

Comment: Would Metro Nashville be eligible for any of these funds?

Response: These funds are only available to non-entitlement jurisdictions that are eligible under the CDBG State program. Metro Nashville is not an eligible jurisdiction.

Comment: Have the funds already been allocated?

Response: No funds have yet been allocated. The list is for the proposed use of the unexpended funds.

Comment: My county is has property located next to the local hospital. We would like to build an EMS facility for training and admin. The cost is estimated between \$3.5 and 4 million. Can this funding be used for this project?

Response: The primary purpose for use of these funds is to assist, aid, and support economic development. The ability to use CDBG funds to increase workforce development and enhance and implement strategic community planning is unique opportunity that may not be afforded in the future. The proposed EMS facility for Haywood County is a notable exception. due to the close proximity to the Memphis Regional Megasite (MRM). With the MRM is

projected to create thousands of new jobs in the region surrounding southwest Haywood County. This proposed EMS facility will be needed and used to respond to the emergency service needs of the area as it develops.

Comment: We are a county of 200k people and we currently have a 100% volunteer fire department outside the city limits (we have only one city in the county). We have been working for about a year to convert to some type of hybrid paid/volunteer department in the county to provide better service and lower the ISO ratings, thereby lowering the insurance premiums for county residents. Latest numbers are 1.5-2 million to get the ball rolling in the right direction.

Response: *This project seems request CDBG funds for a stimulus in fire department personnel salaries and benefits to supplement the hybrid paid/volunteer model. These funds are not eligible for salaries and benefits or operations and maintenance costs.*

Comment: The funding should be allocated equally by region across the state.

Response: *The funding as proposed will primarily go toward economic development and planning needs of Tier 4 and distressed counties. The funding for the Sevier County wildfire recovery is a notable exception.*

Comment: I feel that the \$ 5,500,000 that is being used for west Tennessee is probably going to benefit the megasite and we have a megasite here in Cumberland County that borders Interstate 40 just 30 minutes from Knoxville that needs some state assistance that is not being considered and this site has the potential to provide jobs thru companies to people in several counties.

Response: *Two of the proposed projects are related to the impacts of the Memphis Regional Megasite (MRM), totaling \$4.5 million. Haywood County is a Tier 4 county. The proposed EMS facility will be needed and used to respond to the emergency service needs of the area as it develops. The reroute of the Stanton Wastewater Treatment System will serve multiple purposes. The funds will assist the improvement to a treatment system for a community that is designated 65.9% low and moderate income (LMI). The reroute will provide a positive environmental impact by removing the wastewater discharge point from a tributary of the Hatchie River, the only river in Tennessee designated a state scenic river in its entirety.*

Comment: A great deal of middle and eastern Tennessee suffered through a drought last fall and our neighbors in Bledsoe and Van Buren Counties' were in dire need of additional water supplies. The utility districts in our county assisted those counties to help them and now we are working with them on ways to be prepared in the future to better assist through water line extensions. There does not appear to be any consideration for this type of project.

Response: *The regular round CDBG program allocates approximately \$10-12 million of funding annually toward water system improvements and water line extensions. ECD views these funds as an opportunity to make an impact in economic development, in addition to the community development impact it makes with the regular round CDBG funds. The ability to use CDBG funds to increase workforce development and enhance and implement strategic community planning is unique opportunity that may not be afforded in the future.*

Comment: I love that Sevier County was included.

Comment: I support the usage of these funds for the listed purposes. However, I would recommend that you not limit the workforce development funds to TCATs that put in a Drive to 55 grant application. For example, this would preclude the Nashville State Community College – Waverly Campus in Humphreys County from accessing the funds since they are not part of the TCAT system and were unable to apply for the funds.

Response: Funding the TCATs was chosen due to the historically lesser amount funding of TCATs have received compared to community colleges and four year colleges and universities.

Comment: For the use of \$10,000,000 for workforce development, was any consideration given to further development of LEAP projects, not just Drive to 55 capacity building projects?

Response: The proposed use is for the Drive to 55 Capacity Building fund applicants due to the heavy focus on capital expenditures. A large portion of LEAP is for programming, which is does not fit the CDBG model.

Comment: I had hoped to see the funds spread more throughout the state. I would appear Haywood County and its municipalities will receive \$4,815,000 based on \$2,000,000 (WWTP); \$2,500,000 (EMS facility); and \$315,000 (Regular Round). That would be almost 22% of the \$22 million being spent in 1 out of 95 counties.

Response: The Regular Round grant received by Haywood County was awarded based on the scoring of applications. This grant was the second-highest ranking community livability grant awarded, and it was not a recipient due to funding down the list. The other two proposed projects are related to the impacts of the Memphis Regional Megasite (MRM). Haywood County is a Tier 4 county. The proposed EMS facility will be needed and used to respond to the emergency service needs of the area as it develops. The reroute of the Stanton Wastewater Treatment System will serve multiple purposes. The funds will assist the improvement to a treatment system for a community that is designated 65.9% low and moderate income (LMI). The reroute will provide a positive environmental impact by removing the wastewater discharge point from a tributary of the Hatchie River, the only river in Tennessee designated a state scenic river in its entirety.

Comment: We were hoping that additional distressed counties ARC and CDBG projects could be funded out of the \$10,000,000 allocated for Workforce Development. Perhaps \$3,000,000-\$3,500,000 could be shifted to fund more ARC and CDBG projects for distressed counties.

Response: The unexpended funds are only from the CDBG program, not ARC. Funds must be used for eligible CDBG projects. The purpose of allocating the \$10 million to workforce development is to have an economic impact with a one-time use of CDBG funds. \$4 million of the unexpended funds was already used to fund projects in Tier 4 counties, which includes the distressed counties, down the list of 2016 regular round CDBG applications.

Comment: Is the \$10 million for TCATs to fund those projects which applied last year as part of Drive to 55 Capacity Building Grants and were not funded, or will the TCATs submit a NEW application to vie for these funds? The intended use of funds as stated below doesn't make that clear.

Response: The proposed use is for applicants of the most recent Drive to 55 Capacity Building application round. These applications have already been scored by teams for multiple departments.

Comment: Greetings,

We understand that through some 'reconciliation' accounting that the Delta Regional Authority, DRA, and the TN Department of Economic Development, TNECD, have recently discovered some 'unexpended' balance of funds. The TDEC website (www.tn.gov/ecd/section/CDBG) indicates that you propose federal action to allocate at least \$ 4,500,000.00 of these Community Development Block Grant funds (CDBG) to two sub-projects of a long-proposed greenfield 'megasite' Heavy Industrial Park.

We are pleased to make the following comments. Please make them part of your official record on the co-located Common Plan of Development and we look forward to participating in the Scoping process and an Environmental Impact Statement, EIS, by the U.S. Department of Commerce (DRA?) required by 40 CFR 1502.3 et seq. There are perhaps a hundred technical federal and state regulations to be reviewed in the EIS ranging from land use zoning and proposed inter-basin transfer of water resources to economics and the disproportionate adverse effects.

Wastewater- In Stanton, TN 38069 (population 452) we have a completely efficient, sustainable existing domestic wastewater system* (lagoon-type, POTW) serving less than 200 households (ratepayers) with plenty of excess capacity for our domestic, commercial and industrial growth. *reference NPDES TN0062154.

The proposed \$2 Million for a re-route of wastewater represents an expense of \$4,425.00 per capita (\$10,100.00 per household) but yet, represents ONLY the smallest FRACTION of the capital costs for the proposed sewage treatment plants and the transport of wastewaters. The Sept. 7, 2016 application file for POTW/NPDES TN0081906 describes the co-dependence and co-locations of this sub-project and imposes wastewater transmission for a new distance of 37+ miles through 18 inch forced main pipe and pumpstations to final discharge.

Since the first environmental permit application in fall 2008 (NRS08.260) an Environmental Impact Statement, EIS, and USEPA Economic Guidance O,P,Q,S,T,U and AA has been required of this 'megasite' project, but they have yet never been performed. We look forward to participating in the analysis of this current proposal. There is however, no budget, accounting nor public planning for the source of additional capital, cost-sharing, or any OPERATING COSTs (spare parts, lift pumps, electricity, payroll.....) of the proposed sewage system. With the re-route of our Stanton wastewater, just the OPERATING Maintenance costs alone could prove to be especially burdensome to our local Environmental Justice, EJ, populations. We have been certified EJ by TN DOT and FHWA as

1) minority-race and 2) low-income, but we believe also 3) aged 65+, retired and disabled. There are less than 490 unemployed persons within 535 square miles.

Perhaps, as the EIS Lead Agency (40 CFR 1501.5), the Department of Commerce will find that USDA-Rural Development will be a cooperating agency under 40 CFR 1501.6. In September 2010 the TNECD applicants abandoned their 'megasite' water/wastewater USDA grant application with the Nashville Regional offices as they learned of the requirements of Environmental Impact review and alternatives. The Tennessee Valley Authority, TVA, did not perform an EIS as part of their 'site marketing certification' of 1,320 acres for greenfield conversion of Prime Farmland in 2006.

Public Safety- Stanton, TN and Haywood County-Zip Code 38069 currently support and sustain one Constable and a volunteer fire department for the Fredonia, Hebron, Douglass, Keeling, Shepp and Ko-Ko communities. There are less than 490 unemployed people within 534 square miles.

In August 2016, TN ECD and Commissioner Randy Boyd's C.E.R.T. estimated that the proposed greenfield conversion of Forest, Agriculture and Rural Residential into 'megasite' Heavy Industrial Park would just 'break-even' with the presumption of commitment from 7 seven automotive and aerospace corporations to hire 10,350 skilled workers for ON-SITE within the next 19 months (targeting Sept 2019). Obviously, this would be a monumental influx of long-distance daily commuters, with impacts to be evaluated in the pending, comprehensive, US Dept. of Commerce/DRA's Environmental Impact Statement.

TNECD is also now proposing, one-time, federal action CDBG of \$2.5 million to construct a single remote outpost building on the proposed 'megasite' to house a Fire Department, an Ambulance, and Law Enforcement first responders. The OPERATING costs for staff salaries, equipment and utilities is NOT apparent. We expect there are Environmental Justice, EJ, issues for the burden of these Public Safety costs for us (ratepayers, taxpayers and local stakeholders) to provide services for a speculative, long-distance, commuting workforce (if any, from other municipalities).

After 13 years of TN ECD spending, there is only an EMPTY water tank and a 'new blacktop' road on the TVA proposed 'megasite'. There is no local budget from the water district to build or operate a water supply and no other speculative new ratepayers. The list of 'mega-sized' prospective tenants has been exhausted by three previous ECD Commissioners.

Again, we look forward to participating in the US Dept. of Commerce process of Scoping and preparing their Environmental Impact Statement. Please keep us informed of ALL aspects of the TNECD proposals for CDBG Substantial Amendment (including any decisions of approval or denial). For the Record, please post or send to us any additional comments you may receive and share our Public comments.

Response: We should first state the unexpended balance of funds is from the CDBG program only. No other state or federal funds are included in the balance. Also, none of the proposed projects will take place on or develop the Memphis Regional Megasite (MRM). The Stanton Wastewater Treatment System reroute and the Haywood County EMS facility projects are intended to support and address the impacts of the development of the MRM.

The reroute of the Stanton Wastewater Treatment System will serve multiple purposes. The funds will assist the improvement to a treatment system for a community that is designated 65.9% low and moderate income (LMI). The reroute will provide a positive environmental impact by removing the wastewater discharge point from a tributary of the Hatchie River, the only river in Tennessee designated a state scenic river in its entirety. Lastly, combining residential wastewater with industrial has the added benefit of assisting with the treatment process.

Haywood County is a Tier 4 county, and the proposed EMS facility will be needed and used to respond to the emergency service needs of the area as it develops. With the expectation of thousands of new jobs being created as a result of the MRM and the surrounding area develops, the need adequate emergency services in the area will be underscored. The southwestern region of Haywood County will benefit more by having the EMS facility developed concurrently with the MRM instead of being reactionary.