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# CITY OF BAYTOWN



**2025-2029**

**CITIZEN PARTICIPATION PLAN**



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CHARLES JOHNSON

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# I. CITIZEN PARTICIPATION PLAN OVERVIEW

## A. Introduction and Purpose

The City of Baytown, as an entitlement community under the U.S. Division of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program, is committed to fostering a transparent, inclusive, and effective process for the planning, implementation, and assessment of its CDBG-funded activities. This Citizen Participation Plan (CPP) sets forth the City of Baytown's policies and procedures for public involvement in the development of its Five-Year Consolidated Plan, Annual Action Plans, substantial amendments, and the Consolidated Annual Performance and Evaluation Reports (CAPERs) for the program years 2025 through 2029.

This Plan is developed in accordance with Section 104(a)(2) of the Housing and Community Development Act and HUD regulations at 24 CFR Part 91.105 (for local governments). It is designed to ensure that all citizens, particularly those of low- and moderate-income (LMI), residents of predominantly LMI neighborhoods, and those in areas identified as slums or blighted, have ample opportunity to provide input and review documents related to the CDBG program. The City recognizes that robust citizen participation is vital to identifying the most pressing community development and housing needs, ensuring equitable distribution of resources, and achieving the national objectives of the CDBG program: providing decent housing, a suitable living environment, and expanded economic opportunities, principally for LMI persons.

## B. Goals and Objectives of Citizen Participation

The primary goals of this Citizen Participation Plan are to:

1. **Maximize Participation:** Encourage and facilitate broad-based participation from all segments of the Baytown community, with particular emphasis on low- and moderate-income persons, racial and ethnic minorities, non-English speaking residents, and persons with disabilities.
2. **Identify Needs:** Provide meaningful opportunities for citizens to express their community development, housing, and public service needs and priorities.
3. **Inform Decisions:** Ensure that citizen input is considered in the decision-making process regarding the allocation of CDBG funds and the selection of activities.
4. **Promote Transparency:** Offer clear, timely, and accessible information about the CDBG program, proposed activities, and program performance.
5. **Foster Accountability:** Establish a clear process for citizens to comment on program performance and voice concerns or complaints.

## **II. OVERVIEW OF MAJOR PROCESSES REQUIRING CITIZEN PARTICIPATION**

Citizen participation is required for the following major CDBG program processes:

- Development of the Five-Year Consolidated Plan: This comprehensive strategic plan guides the use of federal CDBG funds for a five-year period, identifying community needs, priorities, and strategies.
- Development of Annual Action Plans: These plans outline specific programs and activities to be undertaken for each program year, detailing how CDBG funds will be used to meet the goals of the Consolidated Plan.
- Substantial Amendments to the Consolidated Plan or Annual Action Plans: Significant changes to approved plans require public review and comment.
- Development of the Consolidated Annual Performance and Evaluation Report (CAPER): This report details the City's progress in achieving its CDBG goals and the utilization of funds during the preceding program year.
- Review and Amendment of the Citizen Participation Plan: This plan itself is subject to public review and amendment to ensure its ongoing effectiveness and compliance.

## **III. CONSOLIDATED PLAN**

### **A. Development of the Consolidated Plan**

Every fifth year the City prepares a 5-year Consolidated Plan to take effect the following year. This comprehensive strategic framework describes the housing and community development needs and priorities as well as a 5-year strategy for addressing those needs. The City must submit this 5-Year Consolidated Plan to HUD in order to receive the annual CDBG entitlement grant. This document is specifically designed to:

- Promote active citizen participation in defining local priority needs and objectives by presenting comprehensive and easily understandable information about the jurisdiction;
- Streamline statutory requirements to effectively achieve the purpose of these regulations in a comprehensive manner;
- Facilitate the creation of Annual Action Plans that align with the Consolidated Plan's priorities and provide a clear basis for performance assessment; and
- Encourage robust consultation with public and private agencies, including those outside the jurisdiction, to foster collaboration and identify shared needs and innovative solutions.

Beginning with the 2025-2029 Consolidated Plan, the City of Baytown must complete an online plan in HUD's Integrated Disbursement and Information System (IDIS) in addition to making PDF and paper copies available for public review. The 2025-2029 funding priorities will be derived

from a combination of resident responses to a comprehensive survey in English and Spanish, Community Development Advisory Committee priorities, and input from stakeholders and various City departments. In order to solicit a broad range of information from the community, the City conducts:

- A survey of residents through online access and/or paper copy in English and Spanish;
- Group meetings and/or individual meetings and phone interviews with various housing, social service, economic development, advocacy, and community-based organizations; and
- At least two public hearings open to all interested parties.

#### B. Annual Action Plans

Each year, the City develops an Annual Action Plan, which serves as the City's application for CDBG funds. This plan describes specific activities and projects that will be funded to achieve the goals and objectives outlined in the current Five-Year Consolidated Plan.

#### C. Consolidated Annual Performance and Evaluation Report (CAPER)

The CAPER is prepared annually to report on the accomplishments, challenges, and overall performance of the CDBG program during the preceding program year. It assesses the City's progress in meeting its stated goals and objectives, and provides an accounting of how CDBG funds were expended.

#### D. Environmental Review Process and Citizen Participation

As required by 24 CFR Part 58, the City of Baytown will conduct environmental reviews for all CDBG-funded activities. Citizen participation is integrated into the environmental review process through:

##### Environmental Notices:

- Notice of Intent to Request Release of Funds (NOI-RROF) and Finding of No Significant Impact (FONSI), when applicable, will be published in a local newspaper and posted on the City website.
- Citizens have a minimum of 7 to 15 days to submit written comments on the environmental finding, depending on the type of notice.

##### Environmental Objections:

Citizens may submit objections regarding the environmental review to both the City and HUD within the designated time period. The City will provide written responses to all comments or objections received during the comment period.

## **IV. COMMUNITY DEVELOPMENT ADVISORY COMMITTEE (CDAC)**

The City of Baytown has established a Community Development Advisory Committee (CDAC) to serve as a vital component of its citizen participation efforts. The CDAC acts as an advisory board to the Community Development Program and the City Council on policy decisions related to the consolidated planning process for the CDBG program.

### **A. CDAC Composition and Appointment**

- The CDAC is comprised of nine (9) residents of the City of Baytown.
- Members are appointed by the City Council, with representation from district-specific areas (six members) and three at-large members, ensuring broad community representation and, importantly, representation from low- to moderate-income areas of the city as defined by HUD.
- Qualifications for appointment include residing within the City limits. The City encourages the appointment of members from diverse backgrounds, reflecting the demographic makeup and varied needs of the community.
- Members serve a term of two (2) years, and there is no term limit.

### **B. CDAC Objective, Roles, and Responsibilities**

The general duties and responsibilities of the Community Development Advisory Committee include, but are not limited to:

- **Advisory Role:** Providing advice and recommendations to the City Council on policy decisions relating to the Consolidated Plan, Annual Action Plans, and the overall CDBG program.
- **Needs Assessment:** Actively participating in community planning meetings to solicit citizen input and assist in the assessment and determination of community needs at both citywide and neighborhood levels.
- **Goal Development:** Assisting in the development of realistic goals and objectives to meet the identified community needs.
- **Application Evaluation:** Evaluating proposals submitted by community organizations and other eligible entities for CDBG funding and providing recommendations to City staff and the City Council on funding allocations.
- **Performance Review:** Participating in assessing all aspects of the City's CDBG performance, including the review of the Consolidated Annual Performance and Evaluation Report (CAPER).
- **Conflict of Interest:** Members are required to disclose any potential conflicts of interest to ensure impartiality in their recommendations.

### C. CDAC Meetings and Public Access

- CDAC meetings are typically held when necessary, often on Tuesdays at 5:30 p.m., at Baytown City Hall or another publicly accessible venue.
- All regular and special meetings of the CDAC are open to the public, in compliance with the Open Public Meeting Act.
- Written minutes of all CDAC meetings are kept and constitute public record, available for review upon request.
- Procedures will be in place to allow for public comment during CDAC meetings, typically providing a designated time for individuals to speak on agenda items.

### D. Staff Support

- City Community Development staff serve as liaisons to the CDAC, providing administrative support, preparing and distributing agendas, keeping minutes, maintaining membership lists, and offering general program information and technical assistance to committee members.

## V. CITIZEN PARTICIPATION AND COMMENTS

### A. Encouraging Citizen Participation: Outreach Strategies

The City of Baytown will undertake comprehensive outreach efforts to ensure widespread awareness and participation, especially among historically underserved populations. These strategies include:

#### 1. Targeted Outreach to LMI and Underserved Populations:

- **Community Meetings/Forums:** Host informal community meetings or forums in various neighborhoods, particularly those with high concentrations of LMI residents or areas targeted for CDBG investment. These meetings will be designed to be less formal than public hearings, encouraging open dialogue and direct feedback.
- **Partnerships:** Collaborate with local non-profit organizations, faith-based institutions, community action agencies, and other service providers that work directly with LMI, minority, and special needs populations to disseminate information and encourage participation.
- **Translation Services:** As Baytown has a significant Hispanic population, all vital public notices, summaries of plans, and key informational materials will be provided in both English and Spanish. Interpreters will be available at all public hearings and major community meetings upon request.

- **Accessibility:** Ensure all meeting venues are physically accessible to persons with disabilities, and provide reasonable accommodations (e.g., materials in alternative formats) upon request.

## 2. Public Notification:

Public notices for public hearings will be posted at least three business days prior to the opening of each hearing. The public notice announcing the opening of a public comment period will be issued in conjunction with the public hearing notice.

Notification will be provided through multiple channels to ensure broad access, including:

- Publication in the local general circulation newspaper (e.g., *Baytown Sun*),
- Posting on the public notice board at City Hall,
- Posting on the City of Baytown’s official website, and
- Sharing via the City’s official social media platforms.

These methods are intended to maximize community awareness and engagement in the CDBG planning and review process.

## B. Public Comment Periods

The City of Baytown will provide reasonable public comment periods for all CDBG-related plans and reports.

- Five-Year Consolidated Plan: A minimum of 30 calendar days.
- Annual Action Plan: A minimum of 30 calendar days.
- Substantial Amendments: A minimum of 30 calendar days.
- Consolidated Annual Performance and Evaluation Report (CAPER): A minimum of 15 calendar days.
- Citizen Participation Plan (and Substantial Amendments): A minimum of 30 calendar days.

## C. Submission of Comments

- Comments can be submitted in writing via mail, email, or in person to the City of Baytown Community Development Division.
- During public hearings, oral comments will be accepted and transcribed.
- All comments received during the designated comment periods will be reviewed and considered by the City. A summary of these comments and the City's responses will be included in the final submitted document.

## VI. PUBLIC HEARINGS

Public hearings are formal meetings held by the Community Development Division and/or the Community Development Advisory Committee (CDAC) to gather input from Baytown residents regarding proposed actions, plans, or program performance under the Community Development Block Grant (CDBG) Program. These hearings provide a structured opportunity for the public to voice concerns, ask questions, and offer suggestions. The City is required to consider all public comments when evaluating proposed actions and funding decisions.

All Baytown residents—whether directly or indirectly impacted by CDBG-funded activities—are encouraged to actively participate in the planning and implementation of these projects. Anyone interested in learning more about the CDBG Program or in influencing how funds are allocated is strongly urged to attend and participate in public hearings.

In accordance with HUD requirements, the City holds public hearings at multiple key stages of the planning and implementation process, including:

- The development of community needs and priorities,
- The allocation of funding to meet those needs,
- The review of proposed activities, and
- The evaluation of program performance.

The City of Baytown conducts a minimum of three (3) public hearings during each annual CDBG Consolidated and Action Planning cycle. Additional hearings are scheduled as needed, especially in cases involving substantial amendments to programs, activities, or funding allocations. The public is also encouraged to participate in the CDAC meeting(s) to review and comment on the Consolidated Annual Performance and Evaluation Report (CAPER).

If public comments are received during these hearings, a summary of all comments, along with the City's responses, will be submitted to HUD as part of the official documentation for the relevant plan or report.

### A. Notice of Public Hearings

- Public notices for all hearings will be published as described in Section V.A.2.
- Notices will clearly state the date, time, and location of the hearing, the purpose of the hearing, the amount of CDBG funds expected to be available, the range of activities that may be undertaken, and the estimated proportion of funds benefiting LMI persons.
- Notices will include information on how to access draft documents, submit written comments, and request accommodations for persons with disabilities or language assistance.

## B. Conduct of Public Hearings

- Hearings will be held at locations that are centrally located and accessible to the public, particularly LMI residents.
- City staff will provide a brief overview of the CDBG program, its objectives, and the purpose of the hearing.
- Opportunity will be provided for citizens to make oral comments and ask questions. City staff will endeavor to provide immediate responses where possible, or commit to providing written responses at a later date for more complex inquiries.
- All comments, both oral and written, will be recorded.
- A sign-in sheet will be provided at all public hearings to document attendance.
- Reasonable accommodations for persons with disabilities and language assistance for non-English speakers will be provided upon advance request (e.g., at least 72 hours prior notice).

## VII. TECHNICAL ASSISTANCE

### A. Assistance Provided

- Information on CDBG program objectives, eligible activities, and national objectives.
- Guidance on the Consolidated Plan and Annual Action Plan development process.
- Assistance in understanding the requirements for submitting project proposals.
- Information on how to access data and identify community needs.
- Support for forming community groups or associations to participate in the planning process.

### B. Availability of Assistance

- Technical assistance will be provided through City staff at the Community Development Division during regular business hours via phone, email, or scheduled appointments.
- Information sessions or workshops may be organized as needed, particularly prior to the application cycle for CDBG funds.

## VIII. ACCESSING INFORMATION

### A. Availability of Documents

- All Consolidated Plans, Annual Action Plans, Substantial Amendments, Environmental Reviews and CAPERS will be made available on the City's website in an easily downloadable format.

- Hard copies will be available for review during regular business hours at the City of Baytown Community Development Division.
- Upon request, documents will be provided in alternative formats to accommodate persons with disabilities (e.g., large print, accessible electronic formats) and translated into other languages as needed.

#### B. Public Records

- All records related to the CDBG program, including public notices, meeting minutes, attendance rosters, and public comments, will be maintained by the City of Baytown Community Development Division and made available for public inspection upon request, in accordance with the Texas Public Information Act. Requests must be submitted online at [www.baytown.org](http://www.baytown.org). Fees for copies may apply based on City policy.

### **IX. AMENDMENTS AND/OR RE-ALLOCATING FUNDS**

#### A. Definition of a Substantial Amendment

An amendment will be considered "substantial" and will require public notice and a 30-day public comment period, and potentially a public hearing, if it meets any of the following criteria:

1. A change in the purpose, scope, or intended beneficiaries of an activity or strategic objective described in the Consolidated Plan or Annual Action Plan.
2. The addition or deletion of a new activity not previously described.
3. A reallocation of CDBG funds among activities that exceeds 25% of the total annual entitlement amount.
4. The elimination of an activity for which CDBG funds have been allocated.
5. A change in the designation of a target area for CDBG funds.

#### B. Non-Substantial Amendments

Amendments that do not meet the criteria for a "substantial amendment" will be considered "non-substantial." These changes do not require a formal public comment period or public hearing but will be documented internally and made available for public review upon request. Examples include minor budget adjustments within an approved activity or changes in administrative procedures.

#### C. Public Participation for Substantial Amendments

For any substantial amendment, the City will:

- Publish a public notice as described in Section V.A.2, initiating a minimum 30-day public comment period.
- Make the proposed amendment available for public review as described in Section VIII.A.
- Consider all public comments received during the comment period prior to adopting the amendment. A public hearing may be held if deemed necessary to gather input.

#### D. Emergency Amendments

In the event of a declared disaster or emergency, such as a major hurricane or a public health crisis like the COVID-19 pandemic, the City of Baytown may reprogram or fund new CDBG activities to address urgent community needs. To expedite this process, the City may reduce the standard 30-day public comment period for substantial amendments to just five (5) days, as allowed by HUD under certain conditions.

HUD Waiver Process: HUD may waive specific regulatory provisions for good cause, such as:

- Presidential disaster declarations under the Stafford Act,
- Emergencies requiring expedited use of Consolidated Plan/Annual Action Plan funds, and
- HUD-issued notices permitting deadline and public participation flexibilities.

When such waivers are issued or approved, the City may amend its Citizen Participation standards to:

- Reduce the public comment period from 30 to 5 days,
- Modify public notification procedures to allow reasonable flexibility,
- Cancel or replace in-person public hearings with virtual meetings if public safety is a concern.

These temporary adjustments ensure a timely and responsive use of CDBG funds during emergencies while remaining compliant with federal guidelines.

## X. ANTI-DISPLACEMENT AND RELOCATION

The City of Baytown is committed to minimizing displacement of persons and businesses as a result of CDBG-assisted activities. In the event that displacement cannot be avoided, the City will comply with all applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and all other pertinent federal regulations (24 CFR Part 42, 24 CFR Part 570.606).

The City's policies and procedures regarding anti-displacement and relocation assistance include:

- **Minimizing Displacement:** The City will prioritize activities that minimize the displacement of persons or businesses, including encouraging rehabilitation of existing housing stock where feasible.
- **Relocation Assistance:** For any project that results in the temporary or permanent displacement of persons or businesses, the City will ensure that affected parties receive fair and equitable treatment, including timely and appropriate relocation assistance, as required by the URA and Section 104(d). This assistance may include advisory services, moving expenses, and replacement housing or business payments.
- **Notices:** All displaced persons and businesses will receive timely and accurate notices of their eligibility for relocation assistance, as well as clear information about their rights and available services.
- **Complaint Process for Relocation:** Displaced persons will have access to a complaint process to address any concerns or disputes regarding relocation assistance.
- **One-for-One Replacement:** For any CDBG-assisted activity that involves the demolition or conversion of lower-income dwelling units, the City will ensure "one-for-one" replacement of those units, or provide a waiver from HUD if applicable, to prevent the loss of affordable housing.

## **XI. SECTION 3**

The City of Baytown is committed to ensuring that employment and economic opportunities generated by CDBG financial assistance are, to the greatest extent feasible, directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities to these persons. This commitment is in accordance with Section 3 of the Housing and Urban Development Act of 1968, as amended (24 CFR Part 75).

The City will implement the following strategies to comply with Section 3 requirements:

- **Contractual Provisions:** All CDBG-funded contracts for construction, rehabilitation, or other public projects will include Section 3 clauses, requiring contractors and subcontractors to make good faith efforts to provide employment and training opportunities to Section 3 residents and contracting opportunities to Section 3 businesses.
- **Outreach:** The City will conduct outreach to Section 3 residents and businesses to inform them of available opportunities related to CDBG-funded activities. This may include working with local job training programs, community colleges, and business associations.
- **Targeting Efforts:** The City will make efforts to identify Section 3 residents and businesses within Baytown who are qualified for specific employment, training, or contracting opportunities.
- **Record Keeping:** The City will maintain records demonstrating its compliance with Section 3, including efforts to provide opportunities and the outcomes achieved.

- Training and Technical Assistance: The City will provide training and technical assistance to its subrecipients, contractors, and potential Section 3 businesses and residents on Section 3 requirements and opportunities.

## **XII. COMMENT & COMPLAINT PROCEDURES**

### **A. Complaints Procedure**

The City of Baytown is committed to addressing citizen complaints regarding the CDBG program promptly and fairly.

- Complaints should be submitted in writing to the Community Development Division, City of Baytown, at [City's Physical Address] or via email at [City's Community Development Email Address].
- Complaints should clearly state the nature of the grievance, the specific issue, and any relevant dates or details.

### **B. Review and Response**

- The City will acknowledge receipt of a written complaint within fifteen (15) calendar days.
- The City will investigate the complaint and provide a written response to the complainant within a reasonable timeframe, typically within fifteen (15) working days of the acknowledgement, detailing the findings and any actions taken or proposed.
- If a resolution cannot be reached at the Divisional level, the complainant may appeal the decision to the City Manager's Office.