

Adams County 2020-2024 Citizen Participation Plan

Introduction

The Citizen Participation Plan (CPP) has been prepared to address Adams County's responsibilities as a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds, as it relates to federally funded programs and associated reporting requirements for the U.S. Department of Housing and Urban Development (HUD). The CPP is the guiding document for citizen participation for HUD required plans, the Consolidated Plan (Con Plan), Annual Action Plan (AAP), and the Consolidated Annual Performance and Evaluation Report (CAPER).

Further, the CPP will be utilized as a guide for the remaining Neighborhood Stabilization Program (NSP) funds and disaster relief funds, Community Development Block Grant Coronavirus (CDBG-CV).

Adams County Community & Economic Development Department, ~~Community Development~~Housing Policy & Community Investments Division (~~Community Development~~HPCI) is the designated lead agency in the development of CPP, Con Plan, AAP, and CAPER for CDBG and HOME. Any comments or questions regarding the Con Plan, AAP, and/or CAPER can be sent to:

Adams County ~~Community Development~~Housing Policy & Community Investments Division
4430 S. Adams County Parkway
Brighton, CO 80601
Main: 720-523-6200
Fax: 720-523-6996

Information can also be found at www.adcogov.org/housing-policy-community-investmentscommunitydevelopment

Purpose of the Citizen Participation Plan

Citizen participation is required as part of 24 CFR § 570.486 (a), which states that citizens should have a reasonable opportunity to be part of the funding process from beginning to the end. ~~Community Development~~HPCI utilizes the CPP to set forth the policies and procedures by which the County will encourage citizens to participate in the development of the strategic plans and the use of the grant funding. ~~Community Development~~HPCI will follow the CPP, as long as the requirements for citizen participation do not restrict the responsibility or authority of the County to develop and execute its Con Plan.

Background

Adams County is an entitlement jurisdiction for CDBG and HOME, funding directly received from HUD. Adams County administers the grants on behalf of the Urban County and HOME Consortium, which includes ensuring the funds are used in accordance with the Code of Federal

Regulations (CFR) and the associated plans, reports and certifications are completed on time and accurately.

The Urban County areas includes the cities of Brighton, Federal Heights, Northglenn, unincorporated Adams County, and Town of Bennett. CDBG funds are utilized in the Urban County areas.

The HOME Consortium includes the cities of Commerce City, Thornton, Westminster, and the Urban County areas. HOME funds are utilized within these designated areas.

Each entitlement jurisdiction must complete a Con Plan at least once every five (5) years (24 CFR § 91.15). The Con Plan is a strategic plan that examines the housing and community development needs of a jurisdiction, sets priorities for HUD grant monies and establishes an action plan for meeting current and future needs. Each Con Plan is also required to have a strategy for citizen participation in the Con Plan planning process (24 CFR § 91.105).

HUD requires an entitlement jurisdiction to submit an AAP each year to receive funding (24 CFR § 91.15). The AAP serves as the County's application to HUD for the following year's funding and includes the projects that the entitlement desires to fund. The AAP also outlines the tasks and objectives that will be accomplished during the program year and includes sections that describe the public participation process, how other resources will be leveraged, and how the County CPPs to address barriers to affordable housing, fair housing and homelessness. The County's funding program year begins July 1 – June 30.

At the end of each program year, the County creates the CAPER, which reviews the progress the County has made in carrying out the priorities in the Con Plan. The report includes a description of the resources made available, the investment of the resources, and the distribution and location of investments, per 24 CFR § 91.520. This report must be submitted to HUD within ninety (90) days of the end of the program year.

Goals

The goals of the CDBG program are to:

- Provide a suitable living environment; including improving the safety and livability of neighborhoods; increasing access to quality facilities and services; revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and
- Provide decent housing; including assisting homeless persons to obtain affordable housing; preservation of existing affordable housing stock; increasing the availability of permanent housing that is affordable to low-income persons without discrimination; and increasing supportive housing that includes structural features and services to enable persons with special needs to live in dignity.

The goals for the HOME program are to fund a wide range of activities that:

- Build affordable housing for rent or homeownership;
- Acquire affordable housing for rent or homeownership;
- Rehabilitate affordable housing for rent or homeownership; or

- Provide direct rental assistance to low-income people.

Limited English Proficiency Persons (LEP)

~~Community Development~~HPCI and its recipients of CDBG and HOME understand the importance of ensuring access to services, as well as LEP persons having the ability to participate in the public input process. LEP persons will be assisted in accordance with the ~~Community Development~~HPCI Language Assistance Plan (LAP).

Hearing Impaired and Special Needs Persons

Adams County will provide accommodations for hearing-impaired and sight-impaired citizens in case of community meetings or public hearings where a significant number of residents can reasonably expect to participate. The Adams County Government Center is Americans with Disabilities Act (ADA) compliant and accessible by public transportation. The public hearings are held on the first floor of the building, which allows easy access regardless of disability. Citizens will need to request needed adaptations within three (3) business days prior to the meetings or hearings for the County to make accessibility arrangements. Please contact ~~the Community Development~~HPCI (contact information above) in advance if you need these services, or if you need written documents in a format accessible to persons with disabilities.

Public Participation

Adams County strives to involve citizens, public agencies, and other impacted parties in the process of setting priorities for the use of CDBG and HOME and identifying community needs. Since the national objectives of the grant are to benefit low-to-moderate income persons, prevent or eliminate slums or blight, or meet an urgent community need, emphasis is placed on involving low-to-moderate income people. Particularly those living in the areas where funds are proposed to be used. Also, the County encourages participation from organizations that provide services to residents, especially those focused on housing services, homeless services, and veteran, senior, and youth services. However, the County invites any interested parties to attend community meetings, and makes available the Con Plan, AAP, CAPER and any Substantial Amendment to these plans before the County submits these documents to HUD.

Community Meetings

Community meetings may be held, as necessary, to communicate information regarding CDBG and HOME funded projects to obtain feedback from low-to-moderate income residents or those that serve these populations in Adams County. Community meetings will be held in locations that are ADA compliant, when available. If residents require special assistance for community meetings, they should contact ~~the Community Development~~HPCI (contact information above) at least three (3) business days in advance of the scheduled meeting.

Public Comment Period

- a) ~~Community Development~~HPCI will hold a 30-day public comment period for the Con Plan and AAP and any Substantial Amendment (define below) to these plans.
- b) ~~Community Development~~HPCI will hold a public comment period of not less than 15 days to receive comments from citizens on the CAPER and on ~~this report~~the CPP.

- c) ~~Community Development~~HPCI will consider any comments or views of citizens received in writing or orally during the public comment period in the preparation of the CPPs, reports and/or Substantial Amendments.
- d) Public comment period requirements for projects that respond to COVID-19 are reduced 5-days pursuant to HUD waivers. ~~Community Development~~HPCI will follow these waivers as long as the waivers are valid.

Public Hearings

- a) ~~Community Development~~HPCI will hold a minimum of two public hearings during each funding year, per 24 CFR § 91.105. The hearing will be held at two different stages of the program year and together, the hearings will address housing and community development needs, development of proposed activities, and review of the program performance.
- b) ~~Community Development~~HPCI will hold one public hearing to obtain the views of citizens on the Con Plan or AAP (24 CFR § 91.105). This hearing will be held after the public comment period. The second public hearing will be held for a Substantial Amendment or for the CAPER. Other public hearings may be held, as necessary. There will be a public comment period before these hearings.
- c) All comments received during the public comment period and at public hearings will be summarized and attached to the strategic plans, reports and/or Substantial Amendments. The comments could influence ~~Community Development~~HPCI to adjust the priorities or projects in the current or future Con Plan or AAP. Any adjustments would be approved by the Board of County Commissioners (BOCC).
- d) ~~Due to COVID-19~~In the case of a public health emergency, ~~all~~ public hearings ~~are~~ will be held virtually on Tuesdays at 9:30 a.m. BOCC agendas are made available to the public as required by Colorado State Law; all notices are published twenty-four (24) hours in advance and are also available on the County's website. Public hearing agendas and information on how to watch public hearings is available at <https://www.adcogov.org/events>. Instructions on how to submit a public comment is provided at <https://www.adcogov.org/bocc>.
- e) ~~Upon return to in-person public hearings~~All in-person, public hearings will be held in the Public Hearing Room located on the first floor of the Adams County Government Center located at 4430 S. Adams County Parkway, Brighton, CO 80601. Public hearings will be held at 9:30 a.m. on Tuesdays.
- f) ~~Community Development~~HPCI will take reasonable steps to assist non-English speaking residents in order to facilitate their understanding and participation in discussions that take place at public hearings and community meetings. Residents requesting translators must contact ~~Community Development~~HPCI at least seven (7) days in advance of the scheduled public hearing or community meeting.

Notice of Public Hearings and Community Meetings

~~Community Development~~HPCI will give residents reasonable and timely notice of meetings and access to materials related to the County's use of CDBG and HOME funds.

- a) Notice of all public comment periods will be published as advertisements in local papers such as, the Thornton/Northglenn Sentinel, Brighton Blade, Westminster Window, I-70 Scout and/or on the County's website beginning on or prior to the first day of the public comment period.

- b) Notices of any community meetings related to specific geographically based CDBG and HOME projects may be mailed (via hardcopy or electronically) to the impacted community members, posted at local community facilities in close proximity to the eligible areas and/or may be distributed to organized groups that would be impacted. Notices will specify the date, time, place and purpose of the meeting as well as contact information.

Substantial Amendment to the Consolidated Plan or Annual Action Plan

Substantial changes shall constitute the following:

- a) A change in the allocation priorities or goals identified in the Con Plan; or
- b) Changes from one project to another where the new activity has not been approved by the BOCC.

All other changes to activities will be considered minor and informal programmatic amendments and will be noted in the program file. Examples may include, but are not limited to, change orders, project close-outs and transfers or re-programming of funds to approved projects in the same program year or to accommodate an unanticipated change in an existing project that does not trigger a substantial change.

If the Con Plan or AAP is approved and it subsequently becomes necessary to substantially change the CPP, ~~Community Development~~HPCI will follow the steps as outlined in the Public Comment Period and Public Hearing Section of this CPP.

Substantial Amendment to the Citizen Participation Plan

Substantial change shall constitute the following:

- A change in the definition of a Substantial Amendment for the Con Plan or AAP; or
- A change in the required Public Comment Periods or Public Hearings; or
- A change to the County's policies or procedures regarding citizen participation, to such an extent that it can no longer reasonably be construed as meeting the original intent approved by the BOCC and HUD.

All other changes to the CPP will be considered minor and informal amendments. Examples may include, but are not limited to, updates to contact information, the modes of outreach utilized, County policies referenced in this CPP that are amended, clarifications of terms used in the document and applicable CFR's referenced in the CPP that are amended and do not substantially change the information included in the CPP.

Complaints and Grievances

It is the policy of ~~Community Development~~HPCI to take reasonable steps to address concerns expressed by citizens and to respond to any formal complaints or grievances in a timely manner.

- a) Citizens should bring any concerns they may have regarding the CDBG and HOME program, plans, policies or projects.
- b) Unresolved issues, complaints, or grievances may be formally submitted to ~~Community Development~~HPCI adhering to the following guidelines:

1. The letter/email must be signed, dated, and indicate if the correspondent is representing his/her personal concerns or those of a larger group, in which case, the name and description of the group must be stated;
 2. The letter/email must contain contact information including the person or organization's name, address, phone number, and an email address; and
 3. The letter/email must clearly identify the specific complaint or grievance and should state what correct action is being sought.
- c) It is anticipated that most concerns can be addressed through direct conversation. Should a written response be requested, ~~Community Development~~Housing Policy & Community Investments will provide timely written answers to letters/emails that follow the guidelines listed in b above. The time required to respond may vary depending upon the nature and complexity of the specific complaint. Where practicable, written answers will be provided within fifteen (15) working days of the receipt of the written complaint.

Information and Records

All information that is due to HUD, including public comment periods, is made available on Adams County's website, and may provide hard copy at public facilities (to be determined prior to dissemination) and during applicable community meetings.

Additional information and records are available upon request. Requested information will be provided with reasonable access to the program's records, subject to County and local laws regarding privacy and obligations of confidentiality. Information is also available on the range of programs and the estimated amount of funds available.