

# Adams County Community Development



## Citizen Participation Plan 2015-2019



# ADAMS COUNTY COMMUNITY DEVELOPMENT CITIZEN PARTICIPATION PLAN

## **Contact**

The Adams County Community Development (ACCD) division is the designated lead agency in the development of the Consolidated Plan (CON), Annual Action Plan (AAP), Consolidated Annual Performance and Evaluation Report (CAPER) and Citizen Participation Plan (CPP) for Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and the Neighborhood Stabilization Program (NSP). ACCD resides within Adams County's Community & Economic Development Department. Any comments or questions regarding the CON, AAP, and/or CAPER can be sent to:

Adams County Community Development  
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/communitydevelopment](http://www.adcogov.org/communitydevelopment)

## **Introduction**

The CPP has been prepared to address Adams County's responsibilities as a recipient of CDBG, HOME, ESG and NSP funds, as it relates to federally-funded programs and associated reporting requirements for the U.S. Department of Housing and Urban Development (HUD).

## **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. ACCD 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. ACCD 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.

## **Background**

Adams County is an entitlement jurisdiction for CDBG, HOME, ESG and NSP, and receives funding directly from HUD and administers the grant, including ensuring the funds are used according to the Code of Federal Regulations (CFR) and the associated plans, reports and certifications are completed on time and accurately.

Each entitlement jurisdiction must complete a CON at least once every five (5) years (24 CFR § 91.15). The CON 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 is also required to have a strategy for citizen participation in the CON 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 March 1 and ends February 28.

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. 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.

The goals for the ESG program are to:

- Engage homeless individuals and families living on the street;
- Improve the number and quality of emergency shelters for homeless individuals and families;
- Help operate these shelters;
- Provide essential services to shelter residents;
- Rapidly re-house homeless individuals and families; and
- Prevent families and individuals from becoming homeless.

The goals for NSP are to fund activities to help stabilize communities that have suffered from foreclosure or abandonment by:

- Establishing finance mechanisms for purchase and redevelopment of foreclosed homes and residential properties;
- Purchase and rehabilitate homes and residential properties abandoned or foreclosed;
- Establish land banks for foreclosed homes;
- Demolish blighted structures; and
- Redevelop demolished or vacant properties.

### **Limited English Proficiency Persons (LEP)**

ACCD and its sub recipients 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 ACCD Language Assistance Plan (LAP).

### **Hearing Impaired and Special Needs Persons**

The 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 in order for the County to make arrangements. Please contact the ACCD staff 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, HOME, ESG and NSP and identifying community needs. Since the national objectives of the grant are to benefit low and moderate income persons, prevent or eliminate slums or blight, or meet an urgent community need, emphasis is placed on involving low and 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 the needs of the homeless, people with disabilities, veterans, the frail elderly, and youth. However, the County invites any interested parties to attend community meetings, and makes available the CON, 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, HOME, ESG and NSP funded project or projects or to obtain feedback from low and 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 ACCD staff at 720-523-6200 during operating hours, Monday through Friday, 8:00 a.m. to 4:30 p.m. at least three (3) business days in advance of the scheduled meeting.

### **Public Comment Period**

- a) ACCD will hold a 30-day public comment period for the CON, AAP and any Substantial Amendment to these plans.
- b) ACCD will hold a public comment period of not less than 15 days to receive comments from citizens on the CAPER and on this report.
- c) ACCD 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.

### **Public Hearings**

- a) ACCD 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) ACCD will hold one public hearing to obtain the views of citizens on the CON 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 ACCD to adjust the priorities or projects in the current or future CON or AAP. Any adjustments would be approved by the Board of County Commissioners (BOCC).
- d) All 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. 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.
- e) ACCD 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 ACCD at least seven (7) days in advance of the scheduled public hearing or community meeting.

### **Notice of Public Hearings and Community Meetings**

ACCD will give residents reasonable and timely notice of meetings and access to materials related to the County's use of CDBG, HOME, ESG and NSP funds.

- a) Notice of all public comment periods will be published as advertisements in local papers such as, Denver Post, ViVi and the Northglenn Sentinel, 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, HOME, ESG or NSP 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 or Annual Action Plan**

Substantial changes shall constitute the following:

- a) A change in the allocation priorities or goals identified in the CON; or
- b) Project budgetary alterations of \$50,000 or more for Public Service projects and more than \$100,000 for Public Infrastructure, Public Facility, or Housing Projects; or
- c) Changes from one activity to another where the new activity has not been approved by the Board of County Commissioners.

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 or AAP is approved and it subsequently becomes necessary to substantially change the CPP, ACCD 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 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 the ACCD 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, HOME, ESG or NSP program, plans, policies or projects to ACCD.
- b) Unresolved issues, complaints, or grievances may be formally submitted to ACCD 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, ACCD 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 programs 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. The public will also have access to the County's Anti-Displacement Procedures, attached as **Appendix A** attached hereto.

## ATTACHMENT A

### ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

Adams County does not intend to undertake any activities in which any occupied and vacant, available for occupancy lower-income housing is demolished or converted to a use other than as lower income housing. If Adams County would undertake such an activity with funds provided under the Community Development Block Grant Program (CDBG) or the HOME Investment Partnership Act Program (HOME) the County would follow the federal regulations under 24 CFR 570.496a(c)(1) and 24 CFR 570.606(c)(1) regarding relocation and replacement of housing.

All replacement housing would be provided within three years after the commencement of the demolition or conversion. Before entering into a contract committing Adams County to provide funds for a project that will directly result in demolition or conversion, Adams County would make public through a public hearing and a publication in the legal notices section of the local newspaper and submit to the U.S. Department of Housing and Urban Development (HUD) the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower income housing that will be demolished or converted to a use other than as lower income housing as a result of an assisted project;
2. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of bedrooms and location on a map of the replacement housing that has been or will be provided;
5. The source of funding and a time schedule for the provision of the replacement housing;
6. The basis for concluding that the replacement housing will remain lower income housing for at least ten (10) years from the date of initial occupancy;
7. Information demonstrating that any proposed replacement of housing units with smaller dwelling units, or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a difference size, is appropriate and consistent with the housing needs and priorities identified in the Five Year Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in items 4-7 are not available at the time of the general submission, Adams County will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

Adams County Community Development (ACCD) is the responsible office within the



County for tracking the replacement of lower income housing and ensuring that it is provided within the required period. ACCD will determine who is responsible for providing relocation payments and other relocation assistance to any lower income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of activities assisted under the Uniform Relocation Assistance Act (URA), Adams County will take the following steps to minimize the direct and indirect displacement of persons from their homes:

1. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent undue financial burden on established owners and tenants.
2. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
3. Coordinate code enforcement with rehabilitation and housing assistance programs.
4. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
5. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.

Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures.