

CITIZEN PARTICIPATION PLAN

UPDATED FOR INCLUSION WITH

2015-2019 CONSOLIDATED PLAN

INTRODUCTION AND PURPOSE OF THE CITIZEN PARTICIPATION PLAN

Greeley's population exceeded 50,000 in 1975, and the City was subsequently designated a Standard Metropolitan Statistical Area. At that time, Greeley was also classified as an "Entitlement City" and became eligible to apply for Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) on an annual basis. Greeley, as a Participating Jurisdiction, also receives HOME Investment Partnership Program (HOME) funds (HUD), and most recently, Neighborhood Stabilization Program (NSP) grants. Receipt of these funds through HUD requires the adoption of a Citizens' Participation Plan. *(Emergency Shelter Grants (ESG) and Housing for Persons with Aids (HOPWA) grants also require a Citizen Participation Plan; however, the City of Greeley does not receive HOPWA, and ESG are allocated through the Weld County Department of Social Services, thus those grants are not covered under this Citizen Plan.)*

This Citizen Participation Plan is prepared in accordance with the U. S. Department of Housing and Urban Development (HUD) regulations at 24 CFR Part 91.105 (Citizen Participation Plan; Local Governments) and updates to the plan were reviewed and approved as part of the 2015-2019 Consolidated Plan. Its purpose is to provide Greeley residents [particularly low- and moderate-income residents; residents residing in low- moderate-income neighborhoods targeted by the Greeley Urban Renewal Authority (GURA) and known as the Redevelopment District]; minorities, non-English speaking persons, and persons with disabilities] with an understanding of their role in the development, implementation, and assessment of housing and community development activities and to encourage their participation in the formulation of the following:

1. Consolidated Plan and each associated Annual Action Plan,
2. Substantial Amendments to the Consolidated Plan, and
3. Consolidated Annual Performance and Evaluation Report (CAPER).

The Greeley Urban Renewal Authority (GURA) administers the federal HUD grants noted above for the City. Any reference to GURA in this document is as the City's grant administrator.

CITIZENS COMMITTEE FOR COMMUNITY DEVELOPMENT

The GURA Board voted to discontinue the Citizens Committee in February 2014 due in part to the difficulty in finding new membership.

ACCESS TO INFORMATION AND RECORDS

This Citizen Plan and other information relating to the City's CDBG, HOME, and NSP programs for the preceding five years are available at:

Greeley Urban Renewal Authority
A Division of the City of Greeley, City Manager's Office
1100 10th Street, Suite 201, Greeley, CO 80631
(970) 350-9380 (phone); (970) 350-9895 (fax)
www.greeleygov.com

1. CONSOLIDATED PLAN PROCESS

The Citizens Participation Plan addresses citizen involvement in the Consolidated Plan process, which includes the following:

- Development and approval of a five-year Consolidated Plan, identifying housing and community development needs in the City of Greeley and setting forth the priorities and strategies to address those needs for the (predominantly) low- and moderate-income persons and neighborhoods in the City.
- Development and approval of Annual Action Plans, which allocate one year's funding (entitlement and program income) to projects and activities that will help the City meet the goals established in the Consolidated Plan.
- Substantial Amendments to the Consolidated Plan.
- Development and approval of the Consolidated Annual Performance and Evaluation Report (CAPER), which reports on the City's progress in meeting the goals identified in the Consolidated Plan.

2. CITIZEN PARTICIPATION

The City encourages citizen participation during the Consolidated Plan process, particularly by those persons with low-moderate-income; residents of the Redevelopment District (predominantly low- moderate-income areas); minorities; non-English speaking persons; the elderly; and persons with disabilities. To facilitate participation, the City will take the following steps to provide the means for participation and comment.

A. Advance public notice will occur for the following:

- Public neighborhood meetings related to the CDBG program and use of funds
- Consolidated Plan is ready for comment/review
- Annual Action Plan is ready for comment/review
- CAPER is ready for review
- Public hearing for the GURA Board's formation of the proposed CDBG budget
- City Council's public hearing for approval of the CDBG budget
- For approval of the Citizen Participation Plan and amendments to the Plan

B. Forms of public notice will include:

- Public display ads, legal notices, and/or press releases in English and Spanish in the *Greeley Tribune*
- Email or general delivery mail to non-profit partners and other interested persons, as deemed appropriate by GURA staff

Public notice may also include, at the discretion of the GURA staff:

- Posted notices at partner non-profit organization offices, City of Greeley offices, local businesses, and/or the Greeley Housing Authority
- Posted notices on the City's website (noted above)

C. Public Hearings

CDBG regulations at 24 CFR 570.486 require a minimum of two public hearings during the Consolidated Plan process: one regarding community needs and the proposed use of funds and the second to assess how funds were spent during the prior program year (CAPER). The City has chosen to hold public hearings as noted below. To comply with regulations, the meetings are held at times and locations convenient to potential or actual beneficiaries.

- As part of the GURA Board's review of annual applications and prior to recommendation to Council for expenditure of funds for the next program year.

This public hearing is held in the fourth floor conference room of the City Hall Annex at 1100 10th Street, generally at 4:30 P.M.

- At a regular Council meeting for approval of the budget and use of funds.
- The second public hearing is held in Council Chambers at 919 7th Street. The meeting generally begins at 6:30 P. M. The hearing is held a minimum of 30 days following the GURA Board meeting to allow for the required citizen comment period on the proposed use of funds for the next year. (If there are not 30 days between meetings, the public comment period will remain open for the full 30 days. If comments are received that could cause the Action Plan to be altered, the Council will hold a subsequent hearing to take those comments into consideration. Efforts will be made to keep 30 days between the two hearings.)
- A third public hearing to assess how funds were expended during the prior program year (through a review of the CAPER) is held at the March meeting of the GURA Board. The hearing is held in the fourth floor conference room of the City Hall Annex at 1100 10th Street, generally at 4:30 P.M.

D. Public Hearing Notices

Public hearing notices will include that the meetings are accessible to persons with disabilities and will provide information for non-English speakers and persons with disabilities with regard to requesting additional assistance at the hearing. Adequate notice of all public hearings and meetings held by the City/GURA will be according to the following standards:

- A legal notice, display ad, and/or press release will be made to the Greeley Tribune at least 10 days prior to each public hearing or neighborhood meeting
- The notices will contain the meeting date, time, place, and topics to be considered at the hearing
- Interpreters will be provided for non-English speaking residents when requested
- Meetings shall be held in locations that are handicapped-accessible
- Other reasonable accommodations will be made for persons with disabilities per the City's Section 504 and Effective Communications Plan

E. Other Meetings Open to the Public

- The GURA Board generally meets the second Wednesday monthly at 4:30 in the fourth floor conference room of the City Hall Annex (address noted above). City Council appoints the seven-member citizen board; the meeting is open to the public.
 - Pre-meeting notices are posted in the City Hall Annex and at City Hall.
- The Citizens Committee for Community Development was discontinued in March 2014 by vote of the GURA Board.
- Other meetings open to the public are held during the formation of the Five-Year Consolidated Plan and Annual Action Plans, as noted under those sections of this document.

3. CITIZEN PARTICIPATION PLAN IMPLEMENTATION

The intent of the Citizen Participation Plan is to encourage the participation of Greeley residents in the Consolidated Plan process, particularly those residents noted earlier in this document. The City will use the following procedures for adoption of or subsequent changes to the Citizen Participation Plan:

- A display ad or legal notice will be placed in English and Spanish in the *Greeley Tribune* newspaper, the draft Plan will be placed on the City's website, and the document made available at the GURA office in advance of the 30-day public comment period. A copy may be requested and will be provided free of charge.
- Residents of Greeley have 30 days to review the Citizen Participation Plan, during which time written comments will be accepted at the GURA office.

- During or after the end of the public comment period, the GURA Board will, as part of a public hearing, recommend adoption of the Citizen Participation Plan (or amendments) to the City Council.
- The City Council will adopt the Citizen Participation Plan (or amendments to the Plan).

Any change in the public participation process as outlined in this document will require an amendment to the Citizen Participation Plan. Amendments to the plan will follow the citizen process identified above.

4. CONSOLIDATED PLAN, ANNUAL ACTION PLANS, AMENDMENTS, AND CAPER

During the Consolidated Plan, Annual Action Plans, Amendments to the Plan, and CAPER preparation, GURA will consult with and encourage participation by as many of the types organizations/community members noted below as they deem appropriate:

- Public and private agencies that assist low- and moderate-income persons and neighborhoods, including City staff, local non-profit service providers and advocates (such as health agencies, homeless service providers, non-profit housing developers, social service agencies that focus on services to children, the elderly, persons with disabilities, persons with substance abuse problems, etc.), and faith-based organizations
- The Greeley Housing Authority
- Low- and moderate-income persons, particularly those living in the boundaries of the Redevelopment District (low- moderate-income neighborhoods in Greeley)
- Other interested citizens, particularly minorities, non-English speaking persons, and persons with disabilities

See the table that follows for easy reference to the citizen process.

Document	Public Participation	Required Time for Public Review	Required Approval	Deadline
(Described in Section 3) Citizen Participation Plan	Ad that Plan is available for public review; 10-day notice of public hearing Review by GURA Board; public hearing to recommend acceptance of Plan	30 day public review and comment period	City Council	N/A. Generally updated with ConPlan; amended as needed.
(Described in Section 4A) Five-Year Consolidated Plan and/or Annual Action Plans	Public Hearing 10-day prior notice of hearing Review by GURA Board, generally in Sept.	30 day public review and comment period Generally Sept-Oct	City Council, by public hearing with 10 day prior notice	Submit to HUD November 15, or as directed by HUD
(Described in Section 4B) Substantial Amendments	No public hearing Reviewed by GURA Board	30 day public review and comment period	City Council	Submit to HUD
(Described in Section 4C) CAPER	Reviewed by GURA Board at Public Hearing, generally in February or March	15 day public review and comment period	City Council	Submit to HUD March 31

A. Consolidated Plan and Annual Action Plans

Before adoption of the Consolidated Plan or any Action Plan thereafter, GURA will (in conjunction with the public hearing process identified above), make the following information available through notices in the *Greeley Tribune* and other means as deemed necessary:

- The projected amount of assistance that Greeley will receive (grant funds plus program income)
- The range of activities that may be undertaken
- The estimated amount that will benefit persons with low- and moderate-incomes

The plans to minimize displacement (even if no displacement is anticipated) will be available for review at the office noted above and provided as a hard copy to anyone requesting the plans.

Process for Citizen Participation: Citizens will be provided with opportunities during the process to provide input and comment and review Consolidated Plans and/or Annual Action Plans through the following steps:

- CDBG applications are available annually the first week in June; HOME applications may be submitted at any time during the year dependent on funding availability.
 - Notice of application availability will be by email to non-profit partners, the Greeley Housing Authority, and other agencies upon request.
- A minimum of one neighborhood meetings during the application process will be held in a location with accessibility and convenience to low- moderate-income residents. (Generally two meetings are held: One at the Greeley Recreation Center and one at the Rodarte Center.)
 - Notice of the meetings will be published in the Greeley Tribune at least 10 days prior to meeting dates and will include the amount of funding expected, types of activities which may be funded, and general meeting information.
- The August meeting of the Citizens Committee will no longer be held; the Committee was disbanded, as earlier noted.
- Two Public Hearings during the Consolidated Plan and/or Annual Action Plan process (see further details on Public Hearings above).
- Notice of a 30-day comment period published in the Greeley Tribune with public comment accepted from the day following the GURA Board Public Hearing (date of the notice) to the date of the City Council Work Session to review Plans (or longer if needed, see above).

B. Amendments to the Consolidated Plan/Annual Action Plans

The City must amend its approved Plan when making one of the following decisions (these are regulatory):

- To make a change in allocation priorities or in the method used to distribute the funds;
- To carry out an activity using funds from any program covered by the Consolidated Plan (including program income) not previously described in the Action Plan; or
- To change the purpose, scope, location, or beneficiaries of an activity.
 - The City has determined that funding changes in an Annual Action Plan will not be considered substantial if the funding change amounts to 10% or less than that allocated to the activity and the funding will go to an activity that is part of that Annual Action Plan.

Process for Citizen Participation

- Staff prepares a Substantial Amendment.
- A notice is placed in the *Greeley Tribune* in English and Spanish inviting written comment from the public. The public must be provided with 30 days to comment on the proposed amendment (regulatory). The City

must consider any comments or views received from citizens in writing, or orally at a public hearing; a summary of comments or views and a summary of any comments or views not accepted and the reason therefor shall be attached to the Substantial Amendment submitted to HUD.

- The GURA Board of Commissioners holds a Public Hearing for general public comment. The Board recommendations will be presented to the City Council.
- The Council will hold a second Public Hearing for approval of the amendment. This should not occur prior to the end of the 30 day comment period.
- HUD will be notified by letter of any amendment to the Consolidated Plan and notice will also be provided to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER) at the end of the Program Year.

Changes Not Requiring Plan Amendment

- When program amendments are of a minor nature and not requiring HUD or City Council approval, the GURA Board of Commissioners will review and solely act upon the proposed changes. A change is considered minor if it does not meet one of the regulatory amendment requirements noted above.

C. Consolidated Annual Performance and Evaluation Report (CAPER)

To provide citizen participation for comment on the CAPER, the following steps will be followed:

- GURA staff or outside consultant will prepare the CAPER, with draft available for review by March 1st.
- An ad noting the availability of the CAPER for review will be posted in the *Greeley Tribune* in both English and Spanish.
- The draft CAPER will be posted on the City's website for review. A copy may be requested from the address previously noted.
- CDBG partners (City Departments, local non-profits working with low- and moderate-income clientele, etc.) will be provided with a written notice of the draft CAPER's availability for review.
- A minimum 15-day comment period will be provided prior to submittal to HUD and will include comments received in writing or orally at a public hearing and responses to the comments.
- The GURA Board of Commissioners will review the CAPER at a public hearing and provide a recommendation that Council accept the CAPER.
- Council will accept the CAPER and address any comments/views.
 - Any comments made in writing during the 15-day comment period will be addressed within 30 days of receipt and comments will be included in the CAPER.

5. OTHER ISSUES WITH REGARD TO CITIZEN PARTICIPATION

A. Availability to the Public

The adopted Consolidated Plan, Substantial Amendments, and the CAPER are available to the public, as follows:

- On the City's website
- By request from GURA, at the address previously noted
- The documents will be made available in a form accessible to persons with disabilities within 30 days of request

B. Access to Records and Consolidated Plan Documents

Reasonable and timely access to information will be provided to public agencies and other interested parties with regard to the City's Consolidated Plan and use of CDBG assistance. GURA should be contacted when access to

records is desired. Copies of the Five-Year Consolidated Plan, Annual Action Plans, and/or the CAPER are available at the office of the Greeley Urban Renewal Authority (address previously noted) free of charge upon request. The documents are also posted on the City's website (also previously noted).

C. Technical Assistance

Upon request, limited technical assistance for developing funding applications/proposals will be provided by GURA staff. Technical assistance meetings during the annual application process are provided, or the applicant can contact GURA at the address/phone number previously provided. Requests should be made in a timely manner and within the time parameters of the current program year.

D. Anti-Displacement

Activities funded and carried out by the City's CDBG, HOME, and NSP grants will, to the greatest extent feasible, minimize the direct, permanent, and involuntary displacement of households. Projects which are deemed beneficial and supportive of the City's overall goals, but which may cause such displacement, will be undertaken by the noted grant funds only if it has been demonstrated that such displacement is necessary and vital to the overall goals of the grant programs, efforts have been taken to reduce the number of households that would be displaced, and the adverse effects on the displaced households is outweighed by the anticipated goals and accomplishments of the proposed project.

It is the policy of the City to provide relocation assistance to all households permanently displaced by the acquisition of real property as required for compliance with HUD regulations under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Public Law 91-646) and Section 104(d) of the Housing and Community Development Act of 1974, as amended. The assistance will be provided expressly to mitigate adverse effects caused for low- and moderate-income household displaced so that an approved project can be carried out. Assistance will include the following:

- Housing counseling and referrals to comparable housing, as necessary, prior to displacement.
- Relocation benefits and moving expense payments for each household displaced.

6. COMPLAINT PROCEDURE – PLANS, SUBSTANTIAL AMENDMENTS, CAPERS

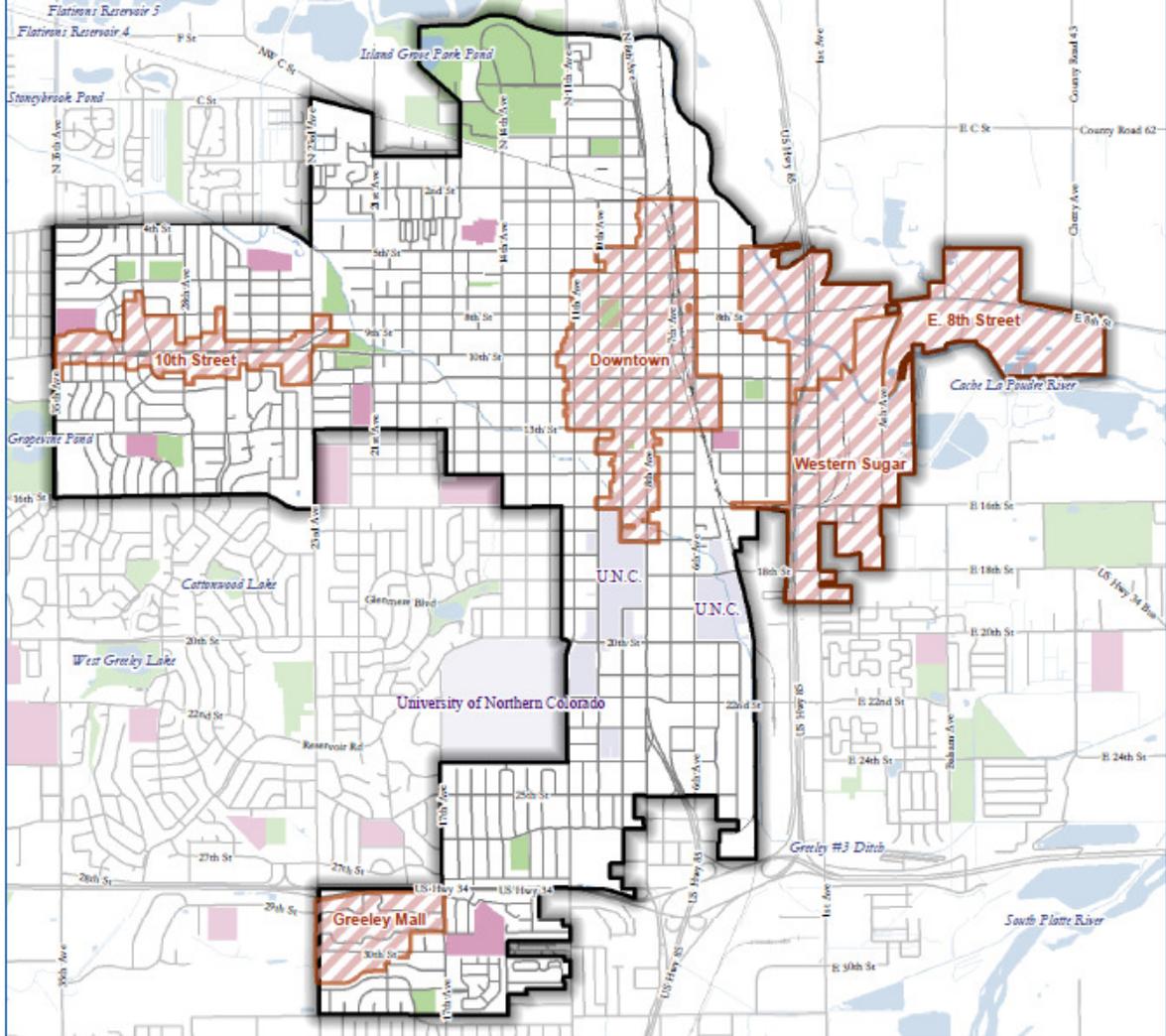
- A. Formal complaints should be made to the **Greeley Urban Renewal Authority** (1100 10th Street, Suite 201, Greeley, CO 80631; 970-350-9380-phone or 970-350-9895-fax). A written substantive response will be provided to written citizen complaints regarding the Consolidated Plan, Annual Action Plans, Substantial Amendments, or CAPERS within 15 working days of receipt.
- B. If not resolved by GURA, formal complaints should be addressed to the City Manager of the City of Greeley and filed in writing at: **City Manager's Office**, City Hall, 1000 10th Street, Greeley, CO 80631. The City Manager will refer the complaint to appropriate City staff for written response regarding the complaint within 15 working days upon receipt of the complaint.
- C. If the complainant is not satisfied with the City Manager's response, further appeals should be addressed to the **Greeley City Council**, c/o the Mayor (City Hall, 1000 10th Street, Greeley, CO 80631). The council has 30 days in which to take further action as deemed necessary to address the complainant's concerns.
- D. If the complainant has not been satisfied with the response of the City Council, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at: **Department of Housing & Urban Development**, 1670 Broadway, Denver, CO 80202-4801.

Formal complaints regarding HUD's approval of the City of Greeley's application for CDBG funding should be submitted in writing to the HUD Area Office within 30 days of the publication of the application notice. In order to ensure that objections submitted be considered during the review process, HUD will not approve an application until at least 45 days after receipt of an application. In the interest of time, therefore, if the complainant is not satisfied with the response from the City staff and wants her/his comments to be considered during the HUD

review process of the city's CDBG application, she/he should then contact HUD directly within the designated time frame.

When the complainant's concern is of a discrimination-related nature (i.e. discrimination on the basis of physical or mental disability, race, creed, color, sex, marital status, familial status, religion, national origin, and/or ancestry) the complainant should directly contact: **The Colorado Civil Rights Commission/Division**, Phone: (303) 894-2997, Toll Free: (800) CO-CIVIL (282-4845). The Colorado Civil Rights Division website, www.dora.state.co.us/civil-rights, provides information about the Division, the Civil Rights Commission, and the process for filing a complaint.

REDEVELOPMENT DISTRICT





City of Greeley

Green. From the Ground Up.

 Created: December 29, 2010

 By: Planning, GIS

Legend

	2010 Urban Renewal Boundary		Public Schools
	Railroad		Universities
	Waterbodies		Parklands
	TIF Districts		
	GURA	Other	
	10th Street	Downtown	
	Western Sugar		
	Greeley Mall		
	E. 8th Street		

Notes:

All planimetric data was digitized from aerial photographs dated 1987, 1992, 1995, 2000, and 2005. Updates are continual and data representations will change over time. This product is not necessarily accurate to engineering or surveying standards but does meet National Mapping Accuracy Standards (NMAA). The information contained within this document is not intended to be used for the preparation of construction documents.

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Annually

June	July	August	September
<ul style="list-style-type: none"> • CDBG Application available 1st Monday • Neighborhood meeting • Technical assistance meeting 	<ul style="list-style-type: none"> • CDBG applications accepted • Neighborhood meeting • Technical assistance meeting • Start Annual Plan in IDIS 	<ul style="list-style-type: none"> • 1st Monday-application deadline for inclusion in all of reviews • Staff review of applications • Citizens Committee meeting 	<ul style="list-style-type: none"> • GURA Board public hearing • 30-day comment period starts day after the meeting • Drop board recommendations into IDIS Action Plan for public comment
October	November	December	January
<ul style="list-style-type: none"> • Council work session • Council public hearing • End of 30-day comment period • Action Plan for Council review • Finalize Annual Plan in IDIS 	<ul style="list-style-type: none"> • Submit Con Plan and/or Annual Action Plan to HUD • Citizens Committee meeting 		<ul style="list-style-type: none"> • Work on CAPER
February	March	April	May
<ul style="list-style-type: none"> • Complete draft of CAPER • In Con Plan years-start consultations • In Con Plan years-start entering in IDIS 	<ul style="list-style-type: none"> • CAPER available for public comment (15 days) • Citizen review of CAPER • GURA Board review of CAPER • Council approval of CAPER (public hearing) • In Con Plan years-cont consultations 	<ul style="list-style-type: none"> • In Con Plan years-cont consultations 	<ul style="list-style-type: none"> • In Con Plan years-draft priorities ready for application

Annual Action Plan

CAPER

Consolidated Plan (also overlap with Action Plan)

Citizen Participation/Technical Assistance