

**CITIZEN PARTICIPATION PLAN for the
CONSOLIDATED PLANNING PROCESS
AMENDED FOR THE
2020-2024 CONSOLIDATED PLAN**

I. CITIZEN PARTICIPATION – GENERAL INFORMATION

AMENDMENT 1: On March 31, 2020, the U. S. Department of Housing and Urban Development (HUD) issued a “Mega Waiver” notice, which set forth guidelines on how different programs under HUD can implement changes to more quickly address the COVID-19 pandemic. Within the “Mega Waiver” are the following as pertains to the Citizen Participation Plan:

- 1. Allow for a reduced public comment time on Substantial Amendments (from 30 to five).**
- 2. Allow for grantees to determine what constitutes “reasonable notice” and opportunity to give comment.**

The Citizen Participation Plan is thus being amended in April 2020 to implement the CARES Act Funding (CDBG-CV) “Mega Waiver” conditions. The GURA Board of Commissioners recommended that the Greeley City Council adopt Amendment 1 to the Citizen Participation Plan on the date noted on the Amendment.

AMENDMENT 2: Due to continuing concerns for the further spread of COVID-19, Amendment 2 was presented to the GURA Board with the request they recommend it to the Greeley City Council for approval. Amendment 2 allows for information to be disseminated by means other than in-person meetings of the Citizens Committee/Focus Groups and neighborhood meetings as part of the Annual and Consolidated Plan processes. Changes, are to the Plan’s Sections B.1, E.1, and E.2. This amendment is done to protect the health and safety of City residents and staff. Amendment 2 changes are in blue, for easier identification.

A. INTRODUCTION

The City of Greeley receives an annual entitlement of Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funding from the U. S. Department of Housing and Urban Development (HUD). The grants provide funding for community development and housing activities that must primarily assist low- and moderate-income residents. On occasion, other HUD grants may be made available to the City (i.e. Neighborhood Stabilization Program or CDBG-Disaster Relief).

The process by which the City determines the priorities, goals, and resources (and reports to HUD on progress) with regard to the grants is called the consolidated planning process. It includes five separate but intertwined processes and resultant plans/reports: (1) Citizen Participation Plan, (2) Analysis of Impediments to Fair Housing study, (3) Five-Year Consolidated Plan, (4) Annual Action Plans, and (5) the Consolidated Annual Performance and Evaluation Report (CAPER).

This document is to meet the requirement that the City, as a recipient of the HUD grants, have and follow a detailed Citizen Participation Plan when developing and implementing the steps of the consolidated planning process. (Reference 24 CFR 91.105-Citizen Participation Plan-Local Governments.)

The City’s Economic Health and Housing Department, Greeley Urban Renewal Authority Division (GURA) is responsible for the implementation of the Citizen Participation Plan and development of the consolidated plan process documents listed below.

B. ENCOURAGEMENT OF CITIZEN PARTICIPATION

Citizens are encouraged to become familiar with the documents of the consolidated planning process, attend public meetings, and offer comments on ways to make the overall community impact greater for low- and moderate-income individuals. Any substantial change to the Citizen Participation Plan, Five-Year Consolidated Plan, or Annual Action Plan requires an amendment. Plans/reports associated with the five steps noted in the Introduction are briefly described below, as are situations requiring an amendment.

1. Citizen Participation Plan

The Citizen Participation Plan sets forth policies and procedures to encourage citizen participation throughout the consolidated planning process. The Plan is in place and amended when needed, generally before the beginning of a new Five-Year Consolidated Plan cycle.

a. Amendments to the Citizen Participation Plan

The Citizen Participation Plan will be reviewed, at a minimum, the year prior to a new Consolidated Plan's formation. The following constitutes a substantial change and an amendment to the Citizen Participation Plan:

- i. Change in City structure that would relieve GURA as the division responsible for the consolidated plan process; change in how documents can be accessed; change in length of time allowed for notices or public comment periods.
 - April 2020 – The Citizen Participation Plan was amended to include the process for the CDBG-CV (Community Development Block Grant-COVID-19 Pandemic). All changes to citizen participation for that grant are noted in Amendment 1, which follows the general body of the current Plan.
 - July 2020 – The Citizen Participation Plan was amended to allow for dissemination of information to citizens by means other than in-person meetings of the Citizens Committee/Focus Groups and neighborhood meetings.

2. Analysis of Impediments to Fair Housing

HUD requires that the City annually certify that it will affirmatively further fair housing by conducting an Analysis of Impediments to Fair Housing, taking appropriate actions to overcome the effects of any impediments identified through the analysis, and maintaining records to reflect the analysis and actions. The Analysis of Impediments study is updated prior to the formation of the Five-Year Consolidated Plan. Its formation includes community participation as the City identifies fair housing goals to increase fair housing choice and provide equal access to opportunity to all in the community.

3. Five-Year Consolidated Plan and Annual Action Plans

The **Five-Year Consolidated Plan** provides a framework through which a community-wide dialogue can be initiated to identify housing and community development priorities that align and focus funding from the CDBG and HOME entitlement programs to the intended beneficiaries. The Five-Year Consolidated Plan for which this amended Citizen Participation Plan pertains is for years 2020-2024, but the Citizen Participation Plan will be implemented with approval from the City Council in November 2018. The Five-Year Consolidated Plan may be amended, as necessary.

The Five-Year Consolidated Plan is carried out through **Annual Action Plans**. Specific federal and non-federal funding resources are identified that will be used during a specific year to fund the actions and activities to achieve the goals of the Five-Year Consolidated Plan. The City Council approves Annual Action Plans as part of its October budget. This allows the Annual Action Plan to be submitted to HUD on November 15th. As with the Five-Year Consolidated Plan, Annual Action Plans may be amended, as described.

a. **Amendments to Five-Year Consolidated Plans/Annual Action Plans** – Federal code at 24 CFR 91.505 sets forth instances requiring an amendment to a Five-Year Consolidated Plan or an Annual Action Plan, specifically if one of the following decisions are made:

- (1) To make a change in its allocation priorities or a change in the method of distribution of funds;
- (2) To carry out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan; or
- (3) To change the purpose, scope, location, or beneficiaries of an activity.

The citizen participation plan must set forth the criteria to be used when determining what constitutes a substantial amendment (which are subject to the City’s citizen participation process). The criteria are below. (Note: The Five-Year Consolidated Plan identifies what the funding **priorities** will be for the stated period. **Goals** are set for the priorities, and implemented through approved **activities**.)

Example for Note –

- ❖ One of the Five-Year Consolidated Plan **priorities** was support of affordable housing.
 - **Goals** set were to (1) assist eight homeowners with housing rehab per year and (2) assist 10 buyers with down payment assistance per year.
 - Applications for each of the noted **activities** are received annually identifying how many people will benefit from the activities and with the intent to reduce the annual goals.

❖ Adding a new priority to a Five-Year Consolidated Plan requires a substantial amendment. (Adding a goal to support the priority does not require a substantial amendment.)

Example – Adding a priority: Adopted Five-Year Consolidated Plan priorities did not include an acquisition of vacant land priority. It is later determined that a blighted property should be purchased and demolished. Adding a **priority** to acquire and demolish blighted property an affordable housing **priority** to the Consolidated Plan requires a substantial amendment.

Example – Adding a goal: Assistance to develop and maintain affordable housing was identified as a **priority** in the Five-Year Consolidated Plan. **Goals** were set for single-family housing rehab and down payment assistance. Later, an application for assistance with a multi-family rehab **activity** is received. Adding a multi-family goal so that an activity can be approved does not require a substantial amendment, but will require a minor amendment that does not have to go through the citizen participation process.

❖ The budget approved by City Council changes – an activity is added.

Example – An activity is added: Mid-year, an application for assistance is received that was not approved as part of the Annual Action Plan budget. There are funds available and it is determined the activity should be implemented. This is a budget change and would require a substantial amendment.

❖ The budget approved by City Council changes – activities stay the same, but funds awarded to the activities change more than 10% of the overall budget.

Example – Increase or decrease in activity: The bid for “Activity One” came in under budget by \$10,000; “Activity Two” came in over budget by \$7,000. The overall budget for the Annual Action Plan year was \$850,000. Because the \$7,000 change is less than 10% of \$850,000, the budgets for the two activities can change without substantial amendment.

Example – Increase/decrease in grant award: An infrastructure activity was awarded \$575,000, but the bid came in for \$450,000. The overage (\$125,000) needs to be moved – either to a new activity or with additional funding for approved activities. A substantial amendment is required.

- ❖ The purpose, scope, location, or beneficiaries of an activity changes.

***Example – Change in scope:** An activity is approved to assist with a public facility’s addition. After budget approval, it is determined that parking spaces will need to be added elsewhere due to the addition. The change in scope would require a substantial amendment. OR A public service is approved for the Housing Navigation Center to support case managers as they assist persons with housing needs. After budget approval, they determine they want to also provide cold weather shelter services under the award. The change in beneficiaries would require a substantial amendment.*

***Note:** If, during the application/budget process, the activities are approved broad enough to cover changes such as those noted in the example, no substantial amendment is needed. For example, if the public facility activity was approved as the addition and any other work needed as a result of the addition, the public would already have been notified of the possible change in scope.*

4. Consolidated Annual Performance and Evaluation Report (CAPER)

Progress made on the goals of the Five-Year Consolidated Plan is reported on through the annual CAPER, which discusses performance annually. It is due to HUD annually by March 31st.

C. TARGET POPULATIONS

The City encourages all its citizens to participate in the stages of the consolidated planning process noted above, with special emphasis placed on encouraging participation from the following populations:

1. Five-Year Consolidated Plan, Annual Action Plans, Citizen Participation Plan

- a. Low- moderate-income persons, residents residing in low- moderate-income neighborhoods, and residents of public and assisted housing developments (including resident advisory boards, councils, and management corporations)
- b. Residents of revitalization or slum/blight areas, and areas where CDBG or HOME funds are proposed for use
- c. Limited or non-English speakers and minorities; persons with disabilities (see additional information in Section II)
- d. Community and City (both public and private) partners interested in the goals of HUD’s entitlement programs, such as the Northern Colorado Region of the Balance of State Continuum of Care, faith- and community-based institutions, nonprofit and philanthropic organizations, businesses, developers, and city departments.
- e. Greeley Housing Authority

2. Five-Year Consolidated Plan only (in addition to those named above)

- a. Broadband internet service providers and organizations engaged in “narrowing the digital divide”
- b. Agencies whose primary responsibilities included the management of flood prone areas, public land, or water resources
- c. Emergency management agencies

D. CONTACT INFORMATION FOR CONSOLIDATED PLAN PROCESS COMMENTS

Citizens are encouraged to review the plans/reports of the consolidated planning process and offer comments at any time, but particularly during the formation of the plans/reports noted in Section I.B. Citizens wishing to comment on or request document copies verbally should call GURA at **970-350-9380** and

request a staff person to which comments on a part of the consolidated plan can be made. Written requests for document copies and/or to submit written comments should be submitted to:

Greeley Urban Renewal Authority - Attn: J. R. Salas (j.r.salas@greeleygov.com)
1100 10th Street, Suite 201, Greeley, CO 80631

E. PUBLIC MEETINGS

The public has several public meeting options through which it can engage with the consolidated planning process, as noted below. See Section II for information on accessibility to the meetings.

1. Citizens Focus Groups or Standing Committees

At the discretion of the GURA Board, focus groups or standing committees may be formed of residents of the Redevelopment District neighborhoods or special populations (persons with disabilities, elderly, etc.) to solicit neighborhood input on the consolidated planning process. (See Amendment 2 with changes to this section.)

2. Neighborhood meetings

Neighborhood meetings will be held during the formation of the Five-Year Consolidated Plan, and Annual Action Plans. Meetings will be held in locations in the Redevelopment District and may include: Rodarte Cultural Center, Greeley Recreation Center, any of the City Center buildings, the downtown library, the Housing Authority office, and others as needed. When setting meeting locations and times, consideration will be given to convenience for low- moderate-income residents and persons with disabilities. (See Amendment 2 with changes to this section.)

3. Greeley Urban Renewal Authority Board of Commissioners (Administrator of CDBG and HOME)

Public meetings of the Greeley Urban Renewal Authority Board of Commissioners, which include concerns of the CDBG and HOME grants, are held (generally) monthly on the second Wednesday at 4:30 p.m. in City Council Chambers (1001 11th Avenue). The meeting agenda (in a suitable format and language) will be provided upon request; allow a minimum of 72 hours prior to the meeting for requests to be processed.

4. Public Hearings of the GURA Board and/or City Council

Federal code requires a minimum of two public hearings, held at two different stages of the program year, that address needs, development of proposed activities, and review of program performance. See Section II for additional information on public hearings.

F. ACCESS TO RECORDS AND CONSOLIDATED PLANNING PROCESS DOCUMENTS

Citizens can access records and documents associated with the consolidated planning process or the public hearings by contacting GURA for a copy (free of charge). The documents are also available on the City's website, www.greeleygov.com. Requests for documents in a language or means other than written English should be made to GURA staff with a minimum of 48 hours allowed for requests to be processed.

1. Assessment of Language Needs

The City conducted a Four-Part Language Needs Analysis and determined the only language other than English represented in great enough numbers to warrant translation to be Spanish. The City has an adopted Limited English Proficiency (LEP) policy.

2. Information Available with Regard to Consolidated Planning Process

Before adoption of a document of the consolidated plan, the City will make available information that includes the amount of assistance expected (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The information will be available to residents, public agencies, and other interested parties.

G. TECHNICAL ASSISTANCE

Technical assistance will be provided during the annual CDBG application process, with notification of the meetings provided in the CDBG Notice of Funding Availability. If additional technical assistance in developing funding applications/proposals is needed, GURA should be contacted.

H. ANTI-DISPLACEMENT

Activities funded and carried out under the federal grant programs earlier noted will, to the greatest extent feasible, minimize the direct, permanent, and involuntary displacement of households. Projects 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 under these conditions:

1. It has been demonstrated that such displacement is necessary and vital to the overall goals of the grant programs,
2. Efforts were taken to reduce the number of households displaced, and
3. Adverse effects on the displaced households are outweighed by the anticipated goals and accomplishments of the proposed project.

City policy is 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:

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

I. COMPLAINT PROCEDURE

1. Formal complaints with regard to any part of the consolidated planning process should be made to the **Greeley Urban Renewal Authority**, address and phone provided under contact information.
2. If not resolved by GURA, formal complaints should be sent to: **City Manager's Office**, City Hall, 1000 10th Street, Greeley, CO 80631.
3. If the complainant is not satisfied with the City Manager's response, further appeals should be sent to: **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.
4. If the complainant has not been satisfied with the response of the City Council, a formal complaint may then be sent directly to the regional Department of Housing and Urban Development (HUD) at: **Department of Housing & Urban Development**, 1670 Broadway, Denver, CO 80202-4801.
5. Complaints with regard to access (ADA, language, etc.) should contact the City of Greeley's designated Disability Rights and Title VI Coordinator, Joel Hemesath at (970) 350-9795, 1001 9th Avenue, Greeley, CO, 80631 or at Joel.Hemesath@greeleygov.com.
6. If the concern is of a discriminatory nature (i.e. discrimination because of physical or mental disability, race, creed, color, sex, marital status, familial status, religion, national origin, and/or ancestry), 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.

With the exception of City Council’s response, complaints will be responded to in writing within 15 working days of receipt of the complaint.

II. CITIZEN PARTICIPATION IN THE CONSOLIDATED PLAN PROCESS

A. STATEMENT OF NON-DISCRIMINATION

The City provides reasonable and timely access to all meetings required in the consolidated planning process and does not discriminate on the basis of disability, race, color, national origin, or gender. Policies and procedures are in place to assist persons with limited English proficiency and/or disabilities.

B. PROVISION OF REASONABLE AND TIMELY ACCESS; MEETING LOCATIONS; RESPONSE TO COMMENTS

1. All documents noted in the consolidated planning process will be available for review and comment as follows:
 - a. Posted on www.greeleygov.com
 - b. Via Access to Records procedures (see Section I)
 - c. Available by request to GURA staff in a format other than written English (allow 48 hours minimum)
2. Notice of availability of any part of the consolidated planning process will be, at a minimum, by:
 - a. Notice published in the Greeley Tribune – English and Spanish ads
 - b. Email or letter to CDBG and HOME partners and citizens that provided prior notification to GURA of interest in the federal grant programs
 - c. All notices will be published a minimum of 10 days prior to the meeting or report/plan availability, as required by Colorado law
3. Meeting locations
 - a. City Council and GURA Board – 1001 11th Avenue (accessible to persons with disabilities)
 - b. Focus Groups and Standing Committees – meeting locations will be determined as groups and committees are implemented, including 1100 10th Street, 4th floor conference room or the GURA office (locations will be accessible to persons with disabilities)
 - c. Neighborhood meetings – various locations in Redevelopment District on a to-be-determined basis
4. Comments

The City will consider any comments or views of Greeley residents or other interested parties received in writing, or verbally at the public hearings, in preparing a Five-Year Consolidated Plan or Annual Action Plan, Substantial Amendments, and the CAPER. A summary of comments or views received, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Five-Year Consolidated Plan/Annual Action Plans.

C. PUBLIC HEARINGS

Public hearings will be held at the following stages of the consolidated planning process:

1. The **GURA Board** will hold a public hearing prior to recommending approval of an Analysis of Impediments to Fair Housing, the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and/or the CAPER (prior to publishing a Plan).
2. **City Council** will hold a second public hearing to approve Five-Year Consolidated Plans, Annual Action Plans, and Substantial Amendments to either Plan. (No public hearing will be held by City Council for the Analysis of Impediments to Fair Housing or CAPER.)

D. ACCESS TO RECORDS-NON-ENGLISH AND PERSONS WITH DISABILITIES

1. Assessment of language needs: The City conducted a Limited English Proficiency Four-Part Analysis and identified the Hispanic ethnicity as the population that exceeds safe harbor provisions, and as such will provide adequate and reasonable notices under the Citizen Participation Plan in Spanish. The City has an adopted Language Access Plan for Limited English Proficiency.
2. The City has an adopted “Americans with Disabilities Act/Section 504 Effective Communications Policy and Procedures” which sets forth the means by which persons with disabilities can access City records. The GURA Board adopted these policies and procedures and will follow them with respect to accessing records and documents associated with the consolidated planning process.
3. Aids and assistance related to Limited English Proficiency or a disability and needed to effectively review any document of the consolidated planning process should call the GURA office (970-350-9380) to initiate the City’s Plans. (Please allow 72 hours for requests to be processed.)

E. ACCESS TO MEETINGS-PERSONS WITH DISABILITIES

The City’s policies and procedures for the Americans with Disabilities Act/Section 504 Effective Communications is the governing document for access to meetings. Public meetings noted above are all in accessible locations. Consult the policies and procedures for additional information.

| Plan/Report | Citizen Participation | Comment Period | Required Approval | Deadline |
|--|--|---|--|--|
| a. Citizen Participation Plan & Amendments | <ul style="list-style-type: none"> Through participation in a focus group or standing committee; not necessarily in person Providing comment during comment period Attend public meeting of GURA Board or City Council | Plan available for 30-day comment prior to approval; 5 days for CDBG-CV amendment 1 | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board Approval by majority vote of City Council No Public Hearing required | Citizen Plan is in place. Amendments as needed, generally prior to new Five-Year Consolidated Plan |
| b. Analysis of Impediments to Fair Housing | <ul style="list-style-type: none"> Participate in resident survey (email, at meetings, online as appropriate) For agencies and other partners – attend a one-on-one or group meeting(s) Through participation in a focus group or standing committee; not necessarily in person Provide comment during comment period Attend the GURA Board public hearing | Analysis of Impediments to Fair Housing study available for 30-day comment period prior to approval | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board with public hearing Approval by majority vote of City Council, no public hearing required | Completed prior to developing new Five-Year Consolidated Plan; no HUD-submittal required, but must maintain records and report on annually |
| c. Five-Year Consolidated Plan | <ul style="list-style-type: none"> Attend a neighborhood meeting, if offered Participate in resident survey (email, at meetings, online as appropriate) For agencies and other partners – attend a one-on-one or group meeting(s) Through participation in a focus group or standing committee; not necessarily in person Provide comment during comment period Attend one of two public hearings (GURA Board, City Council) | Plan available for 30-day comment prior to its approval | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board with public hearing (prior to publishing for comment) Approval by majority vote of City Council with public hearing | To HUD through IDIS on Nov. 15 th |
| d. Annual Action Plans | <ul style="list-style-type: none"> Attend a neighborhood meeting, if offered For agencies and other partners – attend a one-on-one or group meeting(s) Through participation in a focus group or standing committee; not necessarily in person Provide comment during comment period Attend one of two public hearings (GURA Board, City Council) | Plan available for 30-day comment prior to its approval | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board with public hearing (prior to publishing for comment) Approval by majority vote of City Council with public hearing | To HUD through IDIS on Nov. 15 th |
| e. Minor amendment | <ul style="list-style-type: none"> Attend GURA Board meeting | None | <ul style="list-style-type: none"> Approved by majority vote of GURA Board | Through IDIS through resubmittal of Action Plan |
| f. Substantial amendment (See section on what constitutes a substantial amendment) | <ul style="list-style-type: none"> Through participation in a focus group or standing committee; not necessarily in person Provide comment during comment period Attend one of two public hearings (GURA Board, City Council) | Amendment available for 30-day comment period prior to approval; 5 days for CDBG-CV | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board with public hearing Approval by majority vote of City Council with public hearing | Through IDIS through resubmittal of Five-Year Consolidated Plan or an Annual Action Plan |
| g. CAPER | <ul style="list-style-type: none"> Through participation in a focus group or standing committee; not necessarily in person Provide comment during comment period Attend public hearings-GURA Board | CAPER available for 15-day comment prior to its approval | <ul style="list-style-type: none"> Recommendation by majority vote of GURA Board with public hearing held during or after public comment Approval by majority vote of City Council, no public hearing required | To HUD through IDIS by March 31 |

AMENDMENT 1

AMENDED CITIZEN PARTICIPATION PLAN TO IMPLEMENT MEGA WAIVERS SPECIFIC TO SUBSTANTIAL AMENDMENT(S) FOR CDBG-CV GRANT(S)

INTRODUCTION

On April 2, 2020, the U. S. Department of Housing and Urban Development (HUD) released HUD Notice 20-049, which announced the signing of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) into law on March 27, 2020. The CARES Act will provide the City of Greeley with a CDBG-CV grant in the amount of \$493,277. The grant is to prevent, prepare for, and respond to the COVID-19 pandemic. Moreover, a Mega Waiver issued by HUD on March 31, 2020 allowed for amendment to the City's Citizen Participation Plan to expedite the use of CDBG-CV funds.

HUD guidance, used to formulate this Amendment, is stated here and is specific to the following grants: CDBG-CV, CDBG 2019, and CDBG 2020 (and Consolidated Plans associated with those grant years).

“Provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans. In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/ local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.”

The Mega Waiver with regard to the Consolidated Plan process is Attachment A to this Amendment and is the basis on which the Amendment for formulated. The Consolidated Plan process includes changes to CDBG, HOME Investment Partnership Program (HOME), and CDBG-CV funding. Substantial changes within any of those grant process must follow the citizen participation process described below.

The GURA Board of Commissioners will review any draft Substantial Amendment associated with using CDBG-CV (the first of which will include the amended Citizen Participation Plan) and recommend changes to staff or that City Council approves the Substantial Amendment(s). (Staff will incorporate any Board-recommended changes prior to submitting to City Council.) A Substantial Amendment will identify the range of activities that are expected to be included to address COVID-19-generated issues.

AMENDED CITIZEN PARTICIPATION PLAN

The City will implement the Mega Waiver sections involving the Consolidated Plan process, as follows:

Redefined “reasonable notice”

To better expedite the use of CDBG-CV funds, the City has determined that ads notifying the public of Amendments available for comment will be published a minimum of **five (5)** days prior to the start of a public comment period or prior to any public hearing held.

Public notification

- a. The ad for public comment and public hearings will note that the hearings are virtual and cite the means by which the public can “attend”. GURA Staff will respond to any written comments received within 24 hours, including the day following Council’s approval of the Citizen Participation Plan Amendment and the Substantial Amendment to the 2020-2024 Consolidated Plan and 2020 Annual Action Plan.
- b. All of the noted Amendments will be made available on the City’s webpage at www.greeleygov.com/urbanrenewal.
- c. Notification by email and/or phone will be provided to the Citizens Committee for Community Development and the City’s institutional structure agencies.
- d. Public notice will be provided concurrently for the Public Hearings and public comment periods for Substantial Amendments; the April 2020 Substantial Amendment includes the amended Citizen Participation Plan.

Reduced public comment period

The public will have five (5) days in which to comment on any amendment associated with the CDBG-CV grant. Five days will begin at 8:00 a.m. on the day following the Public Hearing of the GURA Board and end at 5:00 p.m. on the fifth day following. (Assuming normal meeting calendars, the GURA Board will hold a Public Hearing on a Wednesday, followed by a public comment period of Thursday at 8:00 a.m. through Monday at 5:00 p.m., with Council’s Public Hearing on Tuesday.)

Public comment may be made in one of the following ways:

- a. In writing during the 10 days of notice prior to the Public Hearing of the GURA Board of Commissioners to be read into record at the Public Hearing.
- b. During the virtual Public Hearing held by the GURA Board of Commissioners.
- c. In writing to carol.larsen@greeleygov.com during the five-day public comment period.
- d. In writing prior to the Public Hearing of the Greeley City Council to be read into record at the Public Hearing.

Allowance for virtual public hearings

For the duration of State and City orders and concern for public gatherings amid the Coronavirus pandemic, public hearings will be held virtually.

1. Notice of how to access the information and how to participate in the public hearings are available on the following websites:
 - a. GURA Board – www.greeleygov.com/urban_renewal
 - b. City Council – www.greeleygov.com/government/council
2. Accessibility –
 - a. Translation from English to Spanish during the GURA Board meeting will be available with request 24 hours in advance.
 - b. City Council’s YouTube can be translated into other languages through that site.

For other accommodation needs, contact the Greeley Urban Renewal Authority, 970-350-9380 or paula.turner@greeleygov.com. The public can get information on attending a virtual hearing on the GURA website (for the GURA Board of Commissioner’s hearing) and on the City Council website (for Council hearings).

Response to comments

Comments received will be responded to within 24 hours of receipt of the comment. The Amendments will not be submitted to HUD until 24 hours after the Public Hearing with the Greeley City Council.

AMENDMENT 2
AMENDED CITIZEN PARTICIPATION PLAN
TO ADDRESS NEIGHBORHOOD MEETINGS DURING ANNUAL PLAN PROCESS
DUE TO COVID-19 PANDEMIC AND SAFE MEETING PRACTICES

Amendment 2 of the Citizen Participation Plan is being adopted due to the COVID-19 pandemic. Amendment 1, adopted previously, adopted reduced time periods for “reasonable notice” and public comment periods. The public will be notified by legal ad in the Greeley Tribune, in English and Spanish, of the five-day public comment period on Amendment 2 to the Citizen Participation Plan. No public hearings are required.

Section E – PUBLIC MEETINGS

The following Subsections of Section E-Public Meetings are amended to read as follows:

E.1. – Citizens Focus Groups or Standing Committees

At the discretion of the GURA Board, focus groups or standing committees may be formed of residents of the Redevelopment District neighborhoods or special population (persons with disabilities, elderly, etc.) to solicit neighborhood input on the consolidated planning process. Due to the COVID-19 pandemic, and to best protect the health and safety of the Greeley residents and City staff, any meeting of a focus group or standing committee may be held virtually in lieu of an in-person meeting. Focus groups/standing committees are not regulatory requirements; the City will make best efforts to convene virtual meetings when in-person meetings are not warranted, but at a minimum, member of any active focus group/standing committee will be provided with Plans, Amendments, etc. for review and comment. Information may be provided via email, mail, or on GURA’s webpage.

E.2. – Neighborhood meetings

Neighborhood meetings are not mandated by CDBG or HOME regulation and will no longer be held during Annual Action Plan formation. Information on CDBG and how the City has utilized the funds historically, the information typically provided at neighborhood meetings, will be available on the GURA website. Staff contacts will be provided. Neighborhood meetings for the Five-Year Strategic Plan will be continued to the extent public health and safety is protected, but will be discontinued if public health and safety could be jeopardized. At a minimum, the GURA website will provide information on the planning process, have drafts of Plans and Reports, and publish contact information for GURA staff able to take public comment and/or answer questions on the Consolidated Planning process.

ATTACHMENT A

CONSOLIDATED PLAN REQUIREMENTS

Note: There are other Mega Waivers in the full notice. Those associated with Consolidated Plan Requirements are #8 and #9, as noted below.

8. Citizen Participation Public Comment Period for Consolidated Plan Amendment

Requirement: 30-day Public Comment Period.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Justification: Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.

Applicability: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY2021 Annual Action Plan.

9. Citizen Participation Reasonable Notice and Opportunity to Comment

Requirement: Reasonable Notice and Opportunity to Comment.

Citations: 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401

Explanation: As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Applicability: This authority is in effect through the end of the 2020 program year.