

**BOULDER COUNTY/BROOMFIELD COUNTY REGIONAL CONSORTIUM  
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**

**CITIZEN PARTICIPATION PLAN**

**Updated 4/28/2020**

**Statement of Intent**

Citizen Participation is an integral part of the overall planning, evaluation, assessment and implementation process of the Boulder County/Broomfield County Regional Consortium's Community Development Block Grant and HOME Investment Partnerships Programs, and any other grant program that is included in the Consolidated Plan submission, together referred to as the Community Planning and Development or CPD Programs. The purpose of this Citizen Participation Plan is to provide all of the citizens of Boulder and Broomfield Counties with the information and mechanisms to allow them to fully participate at all levels of the Consortium's CPD Programs. The Consortium recognizes the importance of citizen participation and fully endorses a philosophy that maximizes citizen involvement in housing and community development activities.

This plan will outline a process that will:

1. Provide citizens an opportunity to participate in the development of the Consolidated Plan for the CPD Programs, set priorities and establish goals.
2. Encourage the submission of views and proposals, particularly by low and moderate income residents.
3. Provide for timely responses to proposals and comments submitted.
4. Schedule meetings, hearings and all other activities of a public nature at times and locations which permit broad participation and attendance.
5. Provide complete information regarding the Consortium's CPD Programs, relevant legislation and regulations and other materials and documents as needed or requested to ensure a knowledgeable citizen involvement.
6. Provides for expedited procedures to draft, propose or amend Consolidated Plans in situations where an emergency or urgent need exists and where HUD has allowed for a waiver of certain Citizen Participation procedures applicable to Sections II.C and II.G, as noted below.

It is the intent of this Citizen Participation Plan that all citizen participation be conducted in an open manner with freedom of access for all persons.

This Plan was reviewed by the appropriate Advisory Boards and then adopted by the Consortium.

**NOVEL CORONAVIRUS RESPONSE:**

Given the need to expedite actions to respond to COVID-19, HUD has waived 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i), 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 the 2020-2024 Consolidated Plan, the 2020 Action Plan and substantial amendments concerning the proposed uses of CDBG and other CPD program funds. Therefore, the following changes to the public comment periods and the way public comment is collected are in effect and apply to Sections II, C, 2. and II. G. of this Citizen Participation Plan for the 2020 program year.

1. The 30-day minimum for the required public comment period is waived for Consolidated Plan submission and for substantial amendments, provided that no less than 5 days are provided for public comments on the Con plan and on each substantial amendment. The waiver is available through the end of the 2020 program year. If the City wishes to undertake further amendments to prior year plans following the 2020 program year, it can do so during the development of its 2021 Action Plan.
2. Efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and so in-person meetings are not required. Therefore, grantees can determine what constitutes reasonable notice and opportunity to comment given their circumstances. The City has determined the following:
  - a. Reasonable Notice is formal public notice in a newspaper of general circulation, and posting on the City's website, outlining the otherwise required elements, and allowing at least 5 days' notice prior to a public hearing to solicit public comment.
  - b. Reasonable opportunity to comment means that at least a five (5) days comment period will be allowed commencing with date of the notice and ending with the conclusion of the public hearing. Comments may be provided prior to the public hearing in writing via email or voice mail (contact information to be provided in the notice), or via submitted comments during the public hearing. The public hearing can be held via a webinar or video or audio conference which allows for comments to be submitted and responded to during the hearing.

In addition, timeliness will be needed in responding to the novel coronavirus and may require quick consideration of applications or requests for funding or an ability to immediately contract with a service provider to allow access to funds and address COVID-19 responses in the community. Therefore, City of Boulder staff will consider and recommend appropriate uses of funding directly to the City Manager and will keep the Technical Review Group (TRG) and Community Development Advisory Council (CDAC) informed of the needs and its recommendations instead of having recommendation come directly from the TRG or CDAC to the City Manager, as noted in Section II. A. below.

## **I. INTRODUCTION**

The Housing and Community Development Act, as amended, requires that citizens be included in an advisory role in the planning, implementation and assessment of every recipient's CPD Programs. In meeting this requirement and in fulfilling the Consortium's commitment to provide residents with a wide range of opportunities to participate in the community development process, the following Citizen Participation Plan has been developed.

Federal regulations governing the CPD Programs require that each community applying for Federal funds must:

1. Provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which CPD Program funds are proposed to be used; provide for participation of residents in low and moderate income neighborhoods as defined by the local jurisdiction; and encourage the participation of residents of public and assisted housing developments;
2. Provide citizens with reasonable and timely access to local meetings, information and records relating to the proposed use of funds;
3. Provide for technical assistance to groups representative of persons of low and moderate income who request such assistance in developing proposals;
4. Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the CPD Programs, including at least the development of needs, the review of proposed activities and review of program performance. These hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
5. Provide for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
6. Identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

This Section may not be construed to restrict the responsibility or authority of the Boulder County/Broomfield County Regional Consortium for the development and execution of its CPD Programs.

## **II. CITIZEN PARTICIPATION PROCESS**

To ensure a well-informed citizenry, the Boulder County/Broomfield County Regional

Consortium's Citizen Participation Plan details mechanisms by which citizens can become involved in CPD Program activities. Recognizing that there is no single best approach to citizen involvement, the Consortium is not limiting citizen involvement to only those mechanisms described below. Citizens who feel they are unable to find an avenue of participation using these mechanisms may suggest alternate procedures to the Consortium. Every effort will be made to accommodate these suggestions. The following is a list of citizen participation activities to be carried out during the coming program years. Details on each activity follow.

- Maintain and support a Housing and Human Services Advisory Board (HHSAB) in Longmont and in Boulder a housing Technical Review Group (TRG), Community Development Advisory Committee (CDAC), and Human Services Technical Review Committee (TRC).
- Provide technical assistance and information
- Sponsor public and performance hearings
- Publish a Consolidated Annual Performance and Evaluation Report
- Encourage citizen assessment of the Consortium's Community Planning and Development Programs
- Answer written complaints and concerns
- Provide for citizen involvement in program amendments
- Develop additional mechanisms as may be required by citizens

**A. ADVISORY BOARDS**

**Longmont**

Longmont's Housing and Human Services Advisory Board (HHSAB) was established pursuant to the Longmont Municipal Code Title 2, Chapter 2.58, Section 2.58.030 in 1980 to act in the role of advisor and supporter of outside human service agencies that serve the residents of the City of Longmont. This role was expanded in 1995 to include making funding recommendations to City Council for the CPD Programs. The HHSAB meets on a regular basis to ensure that the wide range of citizen input is included in each year's submission to HUD.

The HHSAB will provide the following assistance specific to Longmont's CPD Programs.

- Evaluate and recommend priorities regarding community development and housing needs

- Evaluate and monitor existing community development and housing activities to assess Longmont's performance
- Evaluate and recommend proposed and continuing activities for inclusion in subsequent community development and housing submissions
- Review the draft Consolidated Plan and all annual submissions prior to the City's public hearings
- Assist in the development and review of the Citizen Participation Plan to ensure the inclusion of a wide range of citizen comments
- Review the annual Performance Report(s)
- Provide assistance and information to interested groups and/or individuals within the City with particular attention directed toward areas where a significant amount of CPD Program money is now being or will be expended
- Evaluate and make recommendations on any amendments to an approved Consolidated Plan submission
- Assist in the dissemination of information to be used in soliciting community input
- Meet with local officials whenever necessary and appropriate
- Encourage neighborhood residents to attend the various community development and housing meetings and public hearings and to participate in CPD Program activities
- Perform those additional responsibilities which members feel are necessary and appropriate to encourage a meaningful citywide citizen participation program

### **Boulder**

The City of Boulder maintains several committees to direct and guide housing and human services programs including all HOME and CDBG funding. The Technical Review Group (TRG) has five volunteer members appointed by the City Manager. Its primary role is to review funding applications for affordable housing projects and programs and make recommendations to the City Manager. In addition it advises staff on priorities, policies and procedures relating to affordable housing funding. The Technical Review Committee (TRC) and Community Development Advisory Committee (CDAC) have the same structures and roles as the TRG. The TRC advises on local funding for human services

agencies. The CDAC works with CDBG funding for human service agencies.

All of the City of Boulder's committees will review and comment on the draft Consolidated Plan, including input on priorities for affordable housing and community development needs and goals for meeting them.

**B. TECHNICAL ASSISTANCE AND INFORMATION**

The mere presence of citizens at meetings and on advisory boards is not sufficient to assure adequate citizen participation. A well-informed citizenry is required to provide input into this very complex program. The Consortium will work closely with citizens at each possible point of citizen involvement. The Consortium has as its prime areas of responsibility, the role of ensuring that citizens are informed of the various aspects of the program and how their views may be included. The Consortium will provide technical assistance regarding these important program requirements:

- Development of CPD Programs which give maximum feasible priority to activities which will benefit low and moderate income persons or families, prevent or eliminate slums and blight, provide decent housing, provide a suitable living environment and/or expand economic opportunities;
- Acceptance of enforcement responsibilities of environmental laws;
- Compliance with HUD regulations concerning financial management;
- Agreement to enforce fair labor standards requirements;
- Compliance with acquisition and relocation laws;
- Conformance with civil rights laws and regulations; and
- Compliance with fair housing laws and regulations.

Additional technical assistance will be provided to assist individuals and groups so that they may adequately participate in the planning, implementation, and assessment of the CPD Programs. This assistance will be provided for at least the following:

- Preparing citizen proposals and suggestions to be submitted for funding consideration under the CPD Programs.
- Providing information and clarification concerning CPD Program regulations and other program requirements.

- Giving guidance to groups and individuals wishing to participate further in planning, implementing, or assessing the programs.

The Consortium, together with the various Advisory Boards, will invite the participation of low and moderate income individuals, residents of blighted neighborhoods, minorities, the elderly and the handicapped in all activities. Documents relevant to the programs will be made available to citizens at the City of Boulder, City of Longmont, City and County of Broomfield, and Boulder County offices and websites including, but not limited to, a summary of the proposed Consolidated Plan, the adopted Consolidated Plan, and the annual Performance Report(s).

## C. PUBLIC AND PERFORMANCE HEARINGS

### *Consolidated Plan (Every three to five years)*

Pursuant to Federal regulations, The Consortium will hold a minimum of two (2) public hearings during the development of its Consolidated Plan.

#### 1. Identification of Needs

At least one (1) public hearing will be held to obtain views of citizens, public agencies and other interested parties on identifying housing and community development needs. This hearing will be held between 90 and 180 days prior to the beginning of the Consolidated Plan submission year (**generally held between July 1 and October 1**) and will also include a review of the performance of the CPD Programs during the previous year. At this hearing, a representative of the Consortium will describe the CPD Programs over the past program year, including information on total amounts expended, and amounts expended on low and moderate income persons. Handouts will include (1) an overview of the CPD Programs, (2) an Executive Summary of the current Consolidated Plan, (3) the amount of assistance (including grant funds and program income) the Consortium expects to receive over the next program year, (4) the range of activities that may be undertaken and (5) a copy of the Consortium's Anti-displacement Plan . Copies of the annual Performance Report(s) will be available for review.

Citizens attending the Identification of Needs hearing will be given an opportunity to comment both orally and in writing on past performance and on housing and community development needs. The Consortium will summarize all comments for review by the Consortium's Community Development Officials, local agencies and the Advisory Boards. These comments will be considered in completing and will be included in the final Consolidated Plan.

## 2. Presentation of Proposed (Draft) Consolidated Plan

One (1) public hearing will be held to obtain comments on the proposed (or draft) Consolidated Plan. Approximately sixty (60) calendar days prior to the start of the program year (**generally on or before November 1**), a summary of the proposed Consolidated Plan will be published and at least thirty (30) days will be allowed for the receipt of comments on the proposed Plan. The summary will describe the contents and purpose of the Plan, will include the amount that is proposed to benefit persons of low and moderate income and will list the locations where the entire Plan may be examined. Free copies of the Plan will be made available to citizens and groups upon request. The public hearing will be scheduled for midway during the 30 day comment period.

Citizens will be given an opportunity to comment both orally and in writing on the proposed Plan. A summary of these comments, whether they were accepted or not accepted, and the reasons if not accepted will be attached to the final Consolidated Plan.

### **Annual Action Plans**

## 3. Annual Updates

During the three to five years covered by a Consolidated Plan, an Annual Update must be submitted outlining the CPD program activities for the upcoming year. Ninety (90) days prior to the beginning of the program year (**generally between September 1 and October 1**), two (2) public hearings will be held to obtain comments from citizens on the following: 1) any community development and housing needs of recent origin not included in the Consolidated Plan, 2) the proposed one year Action Plans submitted as an annual update to the Consolidated Plan, and 3) program performance for the previous year. Locations and notification of these hearings will be held as outlined in the previous sections. All comments received during the hearings will be summarized and included in the Annual Update.

Hearings shall be held at times and locations which permit broad participation, particularly by low and moderate income persons. Hearings shall be held at locations which are accessible to persons with physical disabilities. Upon advance request, accommodations will be made for Spanish or other foreign language-speakers and/or for the hearing impaired. Notification of all of the above hearings will be published in the *Boulder Camera*, the *Longmont Times-Call* and *Broomfield Enterprise*, posted on the City of Boulder, City of Longmont, City and County of Broomfield and Boulder County websites, and distributed via email to affordable housing providers and social service agencies. All notices about the hearings shall be published, delivered or posted at least fifteen (15) calendar days prior to the date of the public hearing.

The Boulder County/Broomfield County Regional Consortium will make every effort to accommodate non-English speaking citizens who wish to participate in the CPD Programs

or at public or performance hearings. The largest group of persons identified in the 2000 census as persons who do not speak English at all or who do not speak English well were the Hispanic population at a total of 13% of Boulder County's population and 9% of Broomfield's population. There are concentrations of Hispanics in the southeastern portion of Lafayette, in the central areas in Longmont and the eastern portion of Broomfield. The Consortium members maintain a list of employees and other citizens who speak other languages and who may be called upon to translate for these citizens.

***The City of Longmont and the City and County of Broomfield will also follow the above Public and Performance Hearing schedule identified above in order to meet its CDBG Citizen Participation obligations. Additional meetings to meet these requirements will be held in those communities if the above Consortium meetings do not occur in their communities. If the Consortium meetings do happen to be held in their communities, then the meetings can be combined.***

**D. ANNUAL PERFORMANCE REPORT/PROGRAM SUMMARY**

The Consortium will develop and maintain a webpage found at <https://bouldercolorado.gov/housing/funding-2> to inform residents and other interested individuals of the full range of CPD activities, programs and deadlines. In addition, the Consortium will annually prepare and distribute a Program Summary and the annual Performance Report which details past performance and use of funds. At least thirty (30) days prior to submission of the annual Performance Report (**generally on or before February 28**), the Consortium shall make it available for public review and comment. Any comments received during this review period or from the other public hearings held earlier in the year will be considered and a summary will be attached to the Performance Report.

**E. CITIZEN ASSESSMENT AND ACCESS TO RECORDS**

The Consortium encourages citizens to comment on both past performance and ongoing program activities. The Annual Performance Report, adopted Consolidated Plan and any amendments will be made available to all citizens. These documents will also be made available in a form accessible to persons with disabilities, upon request. These documents will be available at the City of Boulder, City of Longmont, City and County of Broomfield, and Boulder County offices and websites. More detailed program information, including the availability of other public program documents can be obtained by contacting the City of Boulder as the Consortium's Lead Entity.

**F. COMPLAINTS AND CONCERNS**

Complaints or concerns regarding the Consolidated Plan may be written, emailed, or phoned in to the City of Boulder Department of Housing and Human Services, 1300 Canyon Blvd., Boulder, Colorado 80302, (303) 441-3157, attention: Community

Investment Program Manager. A written response or acknowledgment of written complaints or concerns will be provided within fifteen (15) working days.

Persons wishing to object to the approval of the Consolidated Plan by HUD may make such objections known to the appropriate HUD State Office. The name and address of the applicable HUD State Office serving the Consortium is:

CPD Director  
Community Planning and Development Division  
U.S. Department of Housing and Urban Development  
Rocky Mountain, Denver  
1670 Broadway Street  
Denver, CO 80202-4801

Although HUD will consider comments, suggestions and/or objections submitted any time, objections specific to the Consolidated Plan should be submitted within thirty (30) days of the publication of the notice that the Consolidated Plan has been submitted to HUD.

**G. PROGRAM AMENDMENTS TO THE CONSOLIDATED PLAN AND CHANGES TO THE CITIZEN PARTICIPATION PLAN**

During the program year, after the Consolidated Plan has been approved, it may be necessary or desirable to change one or more program activities and to add or delete others. Some of these changes will be considered minor and will require no action other than the appropriate approval and submission to the Lead Entity. Other changes are considered major and will necessitate formal citizen participation. The following defines a substantial or major change and a minor or non-substantial change. For a major or substantial change, the requirements set forth in Section C of this document for a public hearing will be followed. Citizens will be given an opportunity to comment both orally and in writing on the proposed amendment. A summary of the comments, whether accepted or not accepted, and the reasons why not accepted, will be attached to the Amendment.

## **Substantial Changes**

### **Definition**

The Consolidated Plan shall be amended in the event of a substantial change. The following constitutes a substantial change:

- Adding any project not previously approved.
- Deleting any previously approved project.
- Changes that are more than \$50,000 per project or that total more than \$100,000 over the course of the fiscal year.
- Changes to a particular project that alter both the beneficiaries and the activity to be undertaken or that necessitate a change to the eligibility or national objective citation.
- A change in the entitlement status of the Consortium or any of its members.
- Program income received during the first half of the program year (by June 30) that exceeds the amount projected in the Consolidated Plan by more than \$50,000.
- Program income received during the 2nd half of the program year that exceeds the amount projected by more than \$25,000 but less than \$50,000 may be handled through this amendment process or may be included in the next year's Consolidated Plan

## **Minor Changes**

**Definition:** Any other change is considered to be a minor or non-substantial change

This Citizen Participation Plan may be modified from time to time with the approval of the Consortium governing body. All changes and revisions must remain consistent with the Federal law and regulations governing citizen participation in the CPD Programs. A summary of the changes and a copy of both the original and proposed amended Citizen Participation Plan will be made available for public information and comment through the Consortium. This Citizen Participation Plan will be made available in different formats for persons with disabilities and in different languages, upon request.

### **Action:**

Formal public notice in a newspaper of general circulation outlining the proposed changes and allowing at least 15 days notice prior to a public hearing to solicit public comment. At least thirty (30) days comment period will be allowed.

Council (for CDBG amendments) if applicable and/or Lead Entity approval of formal amendments to the Consolidated Plan and/or Action Plans.

Submission to HUD.

### **Action:**

Summary of each change to be submitted to the Lead Entity and inserted in Consolidated Plan file.

### **III. DISPLACEMENT**

The Boulder County/Broomfield County Regional Consortium will make every effort to minimize the displacement of persons as a direct result of the implementation of projects funded under one or more of the CPD Programs. If displacement does occur, the Consortium will follow all applicable federal regulations to alleviate the impact of such permanent and involuntary relocations. The Consortium's Anti-displacement Plan and Mitigation statement is attached to this document.

### **IV. ADDITIONAL METHODS AS MAY BE REQUESTED**

The Consortium and its members recognize that there is no single best method for involving citizens in areas of neighborhood and community concern. Therefore, the citizen participation activities of the Consortium's CPD Programs will not be limited to those activities described in this Citizen Participation Plan. The Lead Entity and local staffs will work closely with those citizens who would like to suggest additional methods for citizen involvement. Every effort will be made to accommodate these citizen suggestions.

The Consortium invites and encourages citizen participation at all stages of its Community Planning and Development Programs. Notwithstanding any and all provisions of this Plan, the application and administration of the HOME Programs is the responsibility of the Boulder City Council (as the HOME Lead Entity) which must assume full authority for determining which projects are selected and funded. Therefore, the citizen participation requirement does not supersede the responsibility or authority of the Boulder City Council for the execution of the Consolidated Plan.

The application and administration of the CDBG Programs is the responsibility of each CDBG entitlement community and each community will assume full authority for determining which projects are selected and funded from this source.

The Consortium will accept written or verbal suggestions or comments at any time. The Consortium requests, however, that suggestions be submitted in written format either via a letter or note, or via Boulder's website or email and include a name, address and contact information in case follow up is required.

**V. ADDRESS AND CONTACT PERSONS**

City of Boulder  
Housing and Human Services Department  
1101 Arapahoe, 2<sup>nd</sup> Floor  
Boulder, CO 80302  
(303) 441-4142  
Renee Gallegos, Community Investment  
Program Manager  
GallegosR@bouldercolorado.gov

Broomfield Housing Authority  
City and County of Broomfield  
One DesCombes Drive  
Broomfield, CO 80020  
(303) 438-6396  
Housing Programs Manager

Boulder County  
Housing and Human Services Dept.  
PO Box 471  
Boulder, CO 80306  
(303) 441-1002  
Frank Alexander, Director  
falexander@bouldercounty.org

City of Longmont  
CDBG/AH Division  
350 Kimbark Street  
Longmont, CO 80501  
(303) 651-8736  
Kathy Fedler, CDBG and Affordable Housing  
Programs Manager  
[Kathy.fedler@ci.longmont.co.us](mailto:Kathy.fedler@ci.longmont.co.us)