

DOUGLAS COUNTY COMMUNITY DEVELOPMENT BLOCK GRANT CITIZEN PARTICIPATION PLAN

Introduction

Douglas County is required to adopt and comply with a Citizen Participation Plan that sets forth the jurisdiction's policies and procedures for citizen participation in order to receive Community Development Block Grant (CDBG) funding from the U.S. Department of Housing and Urban Development (HUD). The Citizen Participation Plan (CPP) provides for and encourages citizens to participate in the development of the CPP, 5-year Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER) and any substantial amendments to these documents. HUD's requirements are designed specifically to encourage participation by people who are low- and moderate-income.

Purpose

The funding allocated to CDBG programs is to develop viable urban communities by providing decent housing, a suitable living environment and expanding economic opportunities, especially for low- and moderate-income persons. Within these broad parameters, the CPP outlines how the County will engage citizens and public and private agencies to develop locally derived goals and set funding priorities. The funds are to assist income-eligible residents and fund projects in areas designated as target areas. Citizen participation is vital to identify community needs and establish spending priorities and is required as part of 24 CFR Part 91. The regulations state that citizens should have a reasonable opportunity to be part of the CDBG process from the beginning to the end. The CPP documents the County's goals and policies that identify and set community expectations for participating in housing and community planning and development programs.

Policy

Douglas County's policy is to comply with the Citizen Participation Plan and any federal regulations related to citizen participation. To develop the plans required by HUD, Douglas County consults with citizens, local and regional institutions, housing organizations, and public and private agencies before adopting the required plans.

The Consolidated Plan

The Consolidated Plan includes a housing and homeless needs assessment, market analysis and strategic plan and must be submitted to HUD every 5-years. It builds on and documents citizen participation, the needs identified by the community and CDBG spending priorities. The Plan includes strategies to carry out CDBG programs and is a management tool for assessing performance and tracking results.

Before a Consolidated Plan can be adopted, the County will publish the amount of annual assistance allocated by HUD, list the proposed activities for funding, and the estimated amount that will benefit persons with low- and moderate-incomes. The Consolidated Plan is due to HUD 45-days before the start of the program year, and no earlier than November 15 or later than August 16.

All comments received in writing or orally will be considered. Comments will be summarized and included as a part of the plans. A summary of the comments not accepted for inclusion in the plans, and the reasons why, will be included in the substantial amendment.

In the event that an occupied dwelling must be acquired and demolished as a result of the use of HUD funds, the County will comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and Section 104 (d) of the Housing and Community Development Act of 1974, as amended, as well as any other relocation regulations imposed by HUD. The purpose is to minimize direct and indirect displacement of persons from their homes to the maximum extent possible.

The Annual Action Plan is submitted annually and includes a summary of citizen participation, the consultation results, and required certifications. The Annual Action Plan is due to HUD 45-days before the start of the program year and consists of the subgrantees' proposed projects and use of CDBG funds for the upcoming program year. Technical assistance will be provided to groups representative of persons of low- and moderate-income that request assistance in providing comments or developing proposals for funding assistance.

The CAPER identifies what the subgrantee accomplished during the program year and how funds were utilized. The report is submitted annually and due to HUD 90-days after the end of the program year. Subrecipients awarded CDBG funds are monitored for risk at the end of the program year. The CAPER incorporates these standards and procedures.

Citizen Access to Community Meetings and Information

A minimum of two public hearings will be held annually at various stages of the CDBG program year. Participation is encouraged by offering convenient access to meetings. Written or verbal comments regarding CDBG documents are requested from participants. At least one of these hearings will be held before a proposed Consolidated Plan is published for public comment. When in-person public hearings are prohibited due to emergencies, virtual meetings will be held, as allowed by HUD. During these times, every effort will be made to continue providing opportunities for public comment through other means.

Douglas County will obtain the views of the community on affirmatively furthering fair housing and address Preserving Community and Neighborhood Choice, through the established public hearing and meeting schedule. Organizations with the ability to provide input on housing and members of protected classes, and those that enforce fair housing laws, are included in the consultation process.

Minorities and non-English speaking residents will be included in the CPP process. Douglas County will provide meaningful access to CDBG documents and information in formats that accommodate disabilities and language translation for non-English speakers upon request. Spanish is the predominate non-English language spoken in the County and if requested materials will be made available in Spanish to encourage participation.

Board of County Commissioners' Business Meetings and Hearings

The Douglas County Board of County Commissioners' Business Meetings and Hearings are held on the 2nd and 4th Tuesdays of the month in the public hearing room of the Douglas County Philip S. Miller Building, 100 Third St. in Castle Rock. Business Meetings are at 1:30 p.m. and Public Hearings are at 2:30 p.m. Dates are subject to change; therefore, meeting and hearing dates, times, locations and agendas are posted on Douglas County's website. These meetings are open to the public and allow the public an opportunity to share input on the CDBG program, documents and proposed projects at a convenient time and location that is fully accessible to accommodate persons with disabilities.

The Consolidated Plan, Citizen Participation Plan and Annual Action Plan are scheduled on the Public Hearing agenda. These items are noticed in the local newspaper at least one month in advance of the meeting to provide a summary and promote the public comment period and the public hearing.

CDBG Application Review Meetings

The CDBG Application Review Committee meets during the CDBG application process to evaluate applications and make recommendations for funding. Meeting dates, times, locations and agendas are posted on Douglas County's website. These meetings are open to the public and held at the Philip S. Miller Building, 100 Third St. in Castle Rock.

CDBG Information and Records

Douglas County updates the CDBG website on a regular basis to ensure that subgrantees and the general public have access to application materials, forms, plans, reports, fair housing information, and invitations to public hearings and meetings.

All information that is due to HUD, including public comment periods, is made available for review on the website. This includes drafts of the CPP, Consolidated Plan, Annual Action Plan, and CAPER until they are replaced by the adopted versions of the plans and reports. Draft substantial amendments of the CPP, Consolidated Plan, and Annual Action Plan are also available on the website for review. A reasonable number of hard copies or alternative formats of these plans and reports are available upon request at no charge.

Additional information and records are available upon request. Requested information will be provided with reasonable and timely access to CDBG program records and plans during the preceding 5-years. Availability is subject to County and local laws regarding privacy and obligations of confidentiality. Douglas County maintains project records for a period of 5-years after the completion of the project.

Public Comment Periods

Public comment periods are posted online and are included in the legal section of the local Douglas County community newspapers. Citizens will be notified through a combined notice of the opportunity to comment and attend a public hearing. The documents that are available for public comment are also posted online, a hard copy at the front desk of the Department of Community Development, a hard copy at the front desk of the Douglas County Philip S. Miller Building, and hard copies at the reference desks of the Douglas County Library branches. All documents provided include a telephone number, mailing address, and email address of the staff person responsible to provide a point of contact for input.

Public comment periods are included for the following documents and time frames:

- Annual Action Plan or substantial amendment to the Annual Action Plan (30-day public comment period)
- CAPER (2-week public comment period)
- Consolidated Plan, including the CPP, or substantial amendment to the Consolidated Plan or CPP (30-day public comment period)

Comments are welcome and encouraged. Comment forms are made available for those who would like to remain anonymous. Staff members are on hand to speak with the public, accept comments and answer questions at public hearings or meetings.

Limited English Proficiency Persons

Douglas County will take all reasonable steps to provide language assistance to ensure meaningful access to participation by non-English speaking residents. Should a significant number of non-English speaking residents be expected to participate in a public hearing, translation services will be provided. The County's population is 90% Caucasian and 9% identify as Hispanic. Only 2.3 percent of the population does not speak English "very well". Although the number of people with Limited English Proficiency (LEP) is small, Douglas County and its subgrantees understand the importance of ensuring access to services, as well as LEP persons having the ability to participate in the public input process. LEP persons will be assisted in accordance with Douglas County's Language Assistance Plan. Hard copy versions of the plans and reports required by HUD and materials available on the website will be translated into Spanish with a 5-day notice, upon request.

Hearing Impaired Persons

On the first page of documents available for public comment, Douglas County provides information for persons who are hearing impaired. The following statement is included, "Persons in need of information for the hearing impaired may call the TTY number at 303-663-7791." The Board of County Commissioners' Business Meetings or Public Hearings have closed captioning through the County's Youtube channel, and live town hall meetings are closed captioned through broadband.

Special Needs Persons

All adopted plans and reports will be made available to the public in a form accessible to persons with disabilities upon request. Reasonable and timely access to meetings will be consistent with accessibility and accommodation requirements of section 504 of the Rehabilitation Act of 1973, the regulations at 24 CFR part 8, the Americans with Disabilities Act, and the regulations at 28 CFR parts 35 and 36. The Douglas County Philip S. Miller building is ADA accessible and the meetings are held on the first floor of the building, which allows easy access regardless of disability. In addition, the Board of County Commissioners' meetings are broadcast live on the Internet allowing anyone with Internet access to listen to the meetings, regardless of disability or lack of transportation. Occasionally, meetings are held in other venues. Thoughtful selection of a convenient location in an accessible building will ensure consistent accessibility for all meetings.

Responses to Written Complaints and Grievances

Complaints related to a CDBG document will be addressed in writing no later than 15 business days, where practicable, following receipt of the complaint.

Substantial and Minor Amendments

Occasionally, changes in community priorities, needs, and resources may warrant a change or amendment to the Consolidated Plan, CPP or Annual Action Plan. The County will follow the substantial amendment process. Reallocating the use of CDBG funds between eligible activities or changes to the CPP will require a substantial amendment.

The County will hold one of the two required public hearings to adhere to the CPP in the event of a substantial amendment to the Consolidated Plan, CPP or Annual Action Plan. Citizens will be notified through a notice in the local newspaper of the opportunity to comment and attend the public hearing. The substantially amended sections will be available for review on the Douglas County website and at the County during the public comment period.

The comments included in the plans listed above will be summarized and included in the associated plan. A summary of the comments not accepted for inclusion in the plans, and the reasons why, will be stated in the associated plan.

Other changes to an approved Consolidated Plan, CPP or Annual Action Plan warrant a minor amendment, which is an administrative process without public notice or public comment requirements. Minor amendments require updating the documents and reposting them on the County's website with an explanation of the needed changes to inform interested parties and document the amendment.

Minor amendments include a change in the method of distributing program funds. Examples of the method of distributing funds can include changes to the application process, limiting the size of grants, selection criteria or allocation among funding priority categories. Minor amendments also include using funds from any program covered by the Consolidated Plan but not in the current Annual Action Plan. Changes to the purpose, scope location or beneficiaries of an activity are also classified as a minor amendment.

Prior to approval of amendment, the County will ensure the amendments are consistent with the analysis, strategies and certification to affirmatively further fair housing. Upon completion of any amendment the public will be informed through the County's website and HUD will be notified of the changes to required documents.

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