

Declared Emergency Citizen Participation Plan Clark County

Revised on April 10, 2020:

- Virtual hearings are an allowed method for citizen participation; real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.
- Types of declared disasters or emergency events include natural disasters, terrorism and infectious diseases, such as the coronavirus 19 (COVID-19) Pandemic, that may necessitate expedited substantial amendments;
- Reprogramming of funding and changes to the types of possible activities may be undertaken in response to the declared emergency;
- Waivers were submitted and approved to the Consolidated Plan citizen participation plan, Community Development Block Grant, HOME Investment Partnership (HOME), and Emergency Solutions Grant made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- For HOME, CDBG and ESG funding under FY 2019-2020, FY 2020-2021, and the Coronavirus Aid, Relief, and Economic Security Act or CARES Act, the county will provide a 5-day notice/comment period of a proposed off-cycle change beginning April 1, 2020 as allowed under the HUD waiver. This includes any new activities proposed.
- The Community Development Advisory Committee cannot meet in person during the COVID-19 emergency and a remote process is not feasible. Therefore, applications will be reviewed by a group of county employees from several departments and all recommendations will be taken to the Board of County Commissioners for public comment and approval.

Citizen Participation Plan

Introduction

The purpose of the Consortium Citizen Participation Plan for the HUD Consolidated Plan (HCP) is to encourage participation by all citizens, especially very low- and low-income persons, and particularly those living in blighted areas and areas where CDBG funds may be used. Predominantly low- and moderate-income neighborhoods are those where at least 51% of the population has income at or below 80% of the area median income. Participation includes minorities and non-English speaking persons, and persons with mobility, visual and hearing impairments. In addition, consultation is undertaken with public housing authorities and their residents. The following guidelines provide the steps that are taken by the Consortium and the respective jurisdictions to maximize citizen participation in the development of the HCP and in the allocation of funds.

A portion of the Citizen Participation Plan describes the respective community participation processes developed to ensure an atmosphere of open communication and cooperation between the Consortium, local organizations and businesses, and individual citizens concerned with the health and vitality of their communities, neighborhoods, and homes.

Access to Information

To ensure that citizens and interested groups have access to information that may have an impact on their particular community interests, the following information is available:

- Annual Action Plans
- Five-Year Consolidated Plan
- Consolidated Annual Performance and Evaluation Report

Anti-Displacement

It is the policy of the Consortium to discourage displacement by encouraging non-profit subrecipients to purchase vacant dwellings or dwellings where preliminary tenant surveys indicate eligibility under HOME program. In cases where displacement occurs, the CDBG and HOME Consortium members will follow the requirements of Uniform Relocation Act. Levels of assistance are consistent with the requirements of the Uniform Relocation Act.

Publishing the Plan

Each public meeting shall be posted and advertised in accordance with the Nevada Open Meeting Law and HUD participation requirements. Sufficient advance notice for each of the hearings will be provided. The Consortium will utilize local newspapers, including the Las Vegas Review Journal and El Tiempo to publish a summary of the HUD Consolidated Plan. This summary will describe the contents and purpose of the plan and will include where/how the plan may be examined.

Public Hearings

As required by federal regulations, at least two community-wide public hearings will be held on the Consolidated Plan process, programs covered by the Plan, and to hear comments and concerns on housing and community development needs. One hearing will be held during the development of the draft plan, before its publication for public comment. The second public hearing will be held during the public comment period. The hearings will address housing and community development needs and the proposed activities.

Additionally, in an effort to offer a variety of avenues for public participation, designed to accommodate a range of cultural, communications and learning styles, the following participation opportunities may be offered:

1. Interactive Workshops

A series of interactive workshops may be held in various locations throughout the Consortium. Locations will be selected that ensure accessibility for low-income residents, the disabled, seniors, and based upon geographic eligibility to receive funds. Each session will cover the following topics:

- Orientation to the Consolidated Plan process;
- Review of the programs covered by the Consolidated Plan, the range of activities eligible under those programs, and the amount of funding anticipated being available.
- Review of how the Consortium has employed the resources available to it in addressing the community's housing and community development needs;
- Opportunity for citizens to identify local housing and community development needs and issues, with particular emphasis on new or emerging needs;
- Prioritizing among needs and issues; and
- Identify additional resources the community may leverage to complement or coordinate with state and federal resources.

2. Participation in working groups

A jurisdiction or the Consortium may elect to form one or more small working groups, focusing on specific topics, as part of its Consolidated Plan process. Participation of citizens in these groups will be encouraged.

3. Internet Access

The Citizen Participation Plan, the Consolidated Plan, Annual Action Plans, and Performance Reports will be available to citizens through the Clark County website.

4. Virtual Hearings

Real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

Printed versions of all documents will be made available upon request.

Access to Meetings

Meetings will be located convenient to public transportation, in facilities with handicapped access or virtually with real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. The Consortium will provide translation services during meetings for non-English speaking residents, as appropriate.

Public Comment Period

The HCP participation process will provide a 30-day comment period to allow Consortium citizens to read the proposed HCP and to formulate comments regarding its specific objectives. Draft copies of the HCP will be made available on the Internet at: <http://www.accessclarkcounty.com>.

A reasonable number of complimentary copies will be made available upon request to concerned citizens or assisting agencies. Citizen input provided verbally and in writing will be included in the HCP public comment section. A copy of citizen comments and views will be incorporated in the HCP, and, if applicable, the respective reasons for the non-inclusion of suggested revisions into the final document.

Performance Reports

Consolidated Annual Performance and Evaluation reports (CAPER) are made available to the public for a 15-day review period prior to their submittal to HUD. Notices are published in local newspapers and mailed to interested parties. All citizens' comments, either in writing or presented orally at public hearings, are incorporated into the performance reports.

Plan Availability and Timely Notification

Copies of the HUD Consolidated Plan will be made available on the Internet and may be available at appropriate government offices in each of the jurisdictions and online at <http://www.accessclarkcounty.com>.

The Consortium will provide timely notification by adhering to all posting requirements in compliance with the Nevada Open Meeting Law.

1. *Newspaper Coverage*
At a minimum, space will be purchased to publish announcements and required summaries in a newspaper of general citywide circulation. When appropriate, multiple newspapers may be used, including local non-daily publications, and papers serving minority communities. Display advertisements as well as legal advertisements may be used.
2. *Direct Mail*

The HCP Consortium will create and maintain a master email list of persons and organizations interested in receiving information about the Consolidated Plan. Persons on the email list will receive notice of availability of the Citizen Participation Plan, announcements of interactive workshops and public hearings, and notices pertaining to availability of funding applications, the draft Consolidated Plan, the Annual Action Plan, and performance reports.

3. *Other Media*

The Consortium will prepare, as needed, Public Service Announcements (PSAs) and press releases about interactive workshops and public hearings and provide them to broadcast television and radio stations for their use. PSAs will also be used to recruit citizen participation in working groups and to announce the availability of the Consolidated Plan, Annual Action Plans or performance reports for public comment.

Access to Records

Each of the Consortium jurisdictions will provide reasonable public access to information and related records from the preceding five years.

Technical Assistance

Each of the Consortium jurisdictions will provide technical assistance, upon request, to qualified very low- and low-income groups in developing proposals for funding under any of the programs covered by the HCP. The respective jurisdictions will each determine the level and type of assistance to be provided.

The Consortium will provide needed technical assistance at public meetings, to citizens and their representative groups, concerning the HCP process and the public comment portion of the plan. This assistance will include:

- Providing grant applications and instructions for completion of each for the respective jurisdictions
- Providing staff assistance in completing and responding to questions that may arise out of the development process.

Available Documents

The following documents will be available for public viewing and download at the Clark County Community Resources Management Division website at www.clarkcountynv.gov:

1. The HCP Consortium HUD Consolidated Plan and Annual Action Plans
2. Consolidated Annual Performance and Evaluation Report (CAPER)
3. Community Development Advisory Committee Meeting Agendas and Minutes

The following documents will be available at Clark County Social Service Community Resources Management unit at 1600 Pinto Lane, Las Vegas, NV 89106:

1. Project Environmental Review Records
2. Mailings and promotional materials
3. Records of public hearings
4. Regulations governing the programs

Community Comments and Complaints

The Consortium will solicit input from very low- and low-income persons, particularly those living in blighted areas and where CDBG funds are proposed to be used. Input will be solicited from minorities and non-English speaking persons and persons with mobility, visual or hearing impairments. The HCP consultation process will include input from public housing authorities and their residents.

Public comments received, in writing or orally at the public hearings, will be reviewed by the Consortium's respective jurisdictions to determine if any action is needed. If a response is deemed necessary, the respective jurisdictions will provide a written response to the citizen. A summary of all comments and responses received during the public comment and plan development period will be included in the HUD Consolidated Plan.

If the Consortium receives a written citizen complaint related to the HUD Consolidated Plan development of the citizen participation plan, or to the amendments and performance report, the complaint will be reviewed, summarized and responded to within 15 working days by the Consortium.

Amendments

The criteria for Non-Substantial Amendments and Substantial Amendments are defined as follows:

- Non-Substantial Amendments – Either the termination, addition or change of any planned or actual activity in an amount of \$499,000 or less, or a change in location of any planned or actual activity within a five-mile radius from the original site.

- Substantial Amendments

Either the termination, addition or change of any planned or actual activity in an amount equal to or greater than \$500,000 or a change in location of any planned or actual activity outside a five-mile radius from the original site or any project not previously included in the Annual Action Plan.

Before a Substantial Amendment can be implemented, the respective jurisdiction must provide citizens with a reasonable notice utilizing local newspapers with at least 15 days to comment. The respective jurisdiction shall consider all citizen

comments received and attach a summarized evaluation of acceptable and unacceptable comments to the Substantial Amendment.

Adoption of the Citizen Participation Plan

The HCP shall be approved by the respective Board of County Commissioners and City Councils after the agenda item is legally posted and copies of the HUD Consolidated Plan are made available to the public. The Consortium will provide digital copies to the respective jurisdictions for public review, and will make digital copies available to the Southern Nevada regional Housing Authority.

Citizen Participation Specific to Jurisdictions

Urban County Consortium CDBG and ESG Citizen Participation Process

Under the Cooperative Agreement for Housing and Community Development, Clark County, the cities of Boulder City and Mesquite have agreed "that housing and community development activities are to be performed jointly." As the grantee, the County assumes the role of lead agency ultimately responsible for overseeing the administration of the CDBG plan in terms of meeting citizen participation requirements, ensuring that all four jurisdictions employ affirmative action in the areas of fair housing, equal employment opportunity, business opportunities for minorities and women, and administering environmental review records. The jurisdictions agree "they will assist the lead agency in performing any and all actions required and appropriate to comply with the provisions of the CDBG grant agreements."

Planning activities will follow the same steps each year although the timing may vary somewhat. These steps are:

1. Dissemination of CDBG and ESG information to cities, towns, agencies, and individuals;
2. Identification of community development issues, needs, and concerns (joint effort of staff and citizens committees);
3. Submission of project applications; and
4. Project selection for submission to HUD:
 - a. Meetings and hearings to obtain citizen input,
 - b. Review of project applications for CDBG by CDAC and staff, ESG CoC EWG and staff
 - c. Project recommendations of CDAC and CoC EWG to the Clark County Board of Commissioners,
 - d. Public hearing before the Board of County Commissioners and final selection of projects for application submission to HUD.

The primary conduits for citizen input take place via the countywide Community Development Advisory Committee (CDAC), the CoC EWG, North Las Vegas Citizens Advisory Committee, and the scheduled public hearings and open meetings held in Clark County, North Las Vegas, Boulder City, and Mesquite. Citizen involvement is encouraged through dissemination of timely information and adequate advance notice of meetings

and hearings.

Public Hearings and Meetings

Public hearings and meetings will be the prime vehicle for eliciting public input. Generally, public meetings will be held as needed to extend technical information and to respond to citizen questions and concerns. Public hearings will be held by CDAC, CoC EWG, the Cities of Boulder City, and Mesquite, and the County Commission for the purpose of formal presentation and/or adoption of CDBG documents or policies.

Boulder City, and Mesquite, and each of the unincorporated towns must hold a public hearing to solicit citizen input concerning any projects proposed to be located within their respective boundaries. An endorsement by the appropriate City Council or town advisory board is required for all such projects.

Community Development Advisory Committee (CDAC)

CDAC is composed of thirty-six (36) members of the community. Each of the fourteen (14) town advisory boards and five citizens' advisory councils is entitled to nominate one representative and one alternate, subject to appointment by the Board of County Commissioners. The North Las Vegas, Boulder City, and Mesquite City Councils each appoint a representative and alternate to the Committee. Finally, fourteen at-large members representing low income, minority, elderly, handicapped, housing, and other community-wide interests are selected by the County Commissioners.

CDAC is advisory in nature. The purpose of the Committee is to provide citizen input into CDBG planning and implementation activities. CDAC is responsible for making recommendations to the Board of County Commissioners with regard to the selection of projects to be funded with CDBG monies. It is important that all CDAC members be well informed regarding the CDBG Programs, eligible and ineligible activities, planning and implementation processes, and applicable federal guidelines in order to responsibly fulfill their role as spokespersons for the community. The specific responsibilities of the three types of CDAC members are outlined below:

1. Town Advisory Boards/Citizens Advisory Councils

Members appointed to CDAC by the town advisory boards (TABs) and citizens advisory councils (CACs) primarily represent their respective unincorporated towns and unincorporated areas. They are responsible for insuring that fellow town advisory board members and residents are kept apprised of CDBG and ESG activities, requirements, and timetables. They serve as a conduit for input from their respective towns and areas into the CDBG planning and implementation process.

2. Participating Cities

CDAC representatives from Boulder City and Mesquite serve primarily as non-voting liaisons for their respective cities.

Because Boulder City and Mesquite will be largely responsible for planning and administering their own projects, they are encouraged to conduct independent meetings and hearings soliciting citizen input to augment the CDAC process. Boulder City and Mesquite will meet the citizen participation requirements by conducting at least one City Council public hearing during each program year.

3. Community At-large

The fourteen representatives at large are responsible for insuring that the needs of the low and moderate-income families, elderly, handicapped, and minority populations are expressed and adequately reflected in CDBG activities. They also play a role in keeping County residents informed of program progress.

Project Application and Selection Process

The most difficult task the Community Development Advisory Committee and Citizens Advisory Committee face is selecting which projects and activities are to be recommended for funding. The limited amount of CDBG funds is inadequate to meet the requests of all the participating cities, towns, and neighborhoods. Development of a project ranking system enables CDAC and staff to prioritize proposals in a manner that will best meet countywide strategies and objectives.

The Cities of Boulder City, and Mesquite as well as nonprofit agencies interested in receiving CDBG funds must submit a project application to the Clark County Community Resources Management Division.

Once County staff has received the applications, CDAC and staff review will commence. Open meetings and hearings will be held. Bus tours of agencies and projects requesting funding may be taken. Finally, project selections will be made based on a Project Ranking System determined each year by CDAC. These selected projects will be presented to the Board of County Commissioners for their consideration and approval. Following Commission selection, funding allocations for these projects are approved, and an application and final statement of the final projects will be prepared and submitted to HUD for federal funding approval.

Clark County HOME Program Citizen Participation Process

The City of North Las Vegas receives their HOME funding per an Interlocal Agreement. At its discretion, North Las Vegas may award HOME/LIHTF or other housing funds for projects within its jurisdictions. This may be done by a competition (e.g., an RFP process), or through other means, such as designation by a City Council. The City of North Las Vegas may elect to retain its HOME/LIHTF funds and undertake projects on its own.

The Clark County awards its funds through an RFP process that involves the submission of applications and a review by the Community Development Advisory Committee (CDAC) described above. However, the recommendations of CDAC are advisory only,

and the Clark County Board of Commissioners makes final decisions vis-à-vis HOME and other awards.

Citizen Participation

To help ensure that HOME and Low-Income Housing Trust Fund (LIHTF) monies are used in a manner that responds to community needs, the Community Resources Management Division relies heavily upon participation and comment by the public. Input from the community is obtained in several ways.

First, the Community Resources Management Division publishes Applications or Requests for Proposals (RFP) for HOME and HOME-related programs. The publications are posted in the newspaper(s) of record within Clark County and through ZoomGrants.

Second, Community Resources Management Division staff undertakes additional outreach, whereby potential HOME/LIHTF subgrantees are made aware of the programs through public advertisements, emails, face-to-face meetings with Clark County staff and technical workshops.

Third, the Community Resources Management Division provides a forum for the CDAC, which reviews HOME/AHTF applications and makes recommendations to the Clark County Board of Commissioners. This advisory body includes representatives from local communities, as well as advocates for the homeless, the disabled, and representatives from various minority communities. The membership also includes representatives from the finance/banking industry and from the Clark County and the SNRHA.

Fourth, CDAC members serve annual terms, and their replacement provides yet another means of receiving additional representation from community members.

Fifth, CDAC holds public meetings to hear presentations from HOME/LIHTF applicants concerning their proposed projects to help the low-income achieve a "decent, safe, and sanitary" housing quality standard. A bus tour provides CDAC members and opportunity to visit the project sites, where feasible.

Sixth, applications for HOME/LIHTF grants are presented at public hearings, after which the Clark County Board of Commissioners makes its binding recommendations, which are based upon input from CDAC, County staff, and the general public.

Seventh, Clark County traditionally has awarded well over the 15% statutory minimum to Community Housing Development Organizations (CHDOs). Such organizations are neighborhood- or community-based, have community representatives on their boards of directors, and are specifically charged with affirmatively marketing affordable housing and furthering Fair Housing activities. To date, the Consortium has assumed the CHDO obligation for the State of Nevada, and furthermore, Clark County continues to assume the CHDO obligation for the entire Consortium.