

City of Reno

Citizen Participation Plan

Purpose of Citizen Participation Plan

The purpose of the City of Reno (City) and Washoe County HOME Consortium (WCHC) Citizen Participation Plan (CPP) is to encourage the participation of a wide spectrum of citizens in the development, implementation, performance assessment, and amendments to the Consolidated Plan, including the annual allocation processes for HOME and CDBG funds. The CPP is meant to encourage low-income residents, service providers, developers and other users or beneficiaries of this funding to assist in the identification of housing priorities and non-housing community development needs. In addition, public input is desired to determine how well the annual action plan implements the priorities and how well the region has performed in meeting the priority needs of lower income citizens.

The Citizen Participation Goals for the City of Reno and WCHC are:

1. To provide citizens with the opportunity to meaningfully participate in the planning process by providing adequate and timely information about the range of activities that may be undertaken by the CDBG, HOME and ESG programs, the kinds of activities previously funded in the community, and the level of funding available to carry out these activities.
2. To encourage the involvement of those low- and moderate- income residents most likely to be affected by the CDBG, HOME and ESG programs.
3. To provide citizens an opportunity to express needs and preferences about proposed activities.
4. To provide citizens with the opportunity to assess and submit comments on all aspects of the CDBG, HOME and ESG programs.
5. To provide technical assistance to groups that represent and provide services to low- and moderate- income persons requesting assistance in developing proposals.
6. To provide a timely written answers to written complaints and grievances.
7. When implementing eligible activities under the CDBG, HOME and ESG programs, to minimize displacement of persons and provide assistance to any persons displaced in conformance with the Uniform Relocation Act.

The Consolidated Plan

The Consolidated Plan is a U.S. Department of Housing and Urban Development (HUD) requirement for a city to receive federal housing and community development funding. The Consolidated Plan report examines the housing and community development needs of a city, sets priorities for HUD grant monies which include Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant

(ESG) to which a city is entitled, identifies the city's performance in meeting its goals and establishes an action plan for meeting current and future needs.

Each Consolidated Plan is also required to have a strategy for citizen participation in the Consolidated Planning process. This strategy is called a "Citizen Participation Plan." The Citizen Participation Plan must be adopted by the local jurisdiction receiving funds and must incorporate minimum noticing requirements as set forth in Section 24 CFR Part 91.105. The process is the same for all HUD entitlement programs, including CDBG, HOME, and ESG programs, unless otherwise specified.

Advertising the citizen participation plan

The City of Reno will provide information to human service agencies and nonprofit organizations that apply for funding and encourage them to post the notices so clients can be aware of the public planning and allocation processes. Such organizations typically serve low-income residents of targeted revitalization areas in which the developments are located, persons living in slum and blighted areas where CDBG funds are proposed to be used, residents of predominantly low- and moderate-income neighborhoods (as defined by the jurisdiction), minorities and non-English speaking persons, and persons with disabilities.

The Reno Housing Authority (RHA) is an active partner in the development and implementation of the Consolidated Plan. The RHA will be provided with information about Consolidated Plan activities so they can determine how those activities relate to their developments and surrounding communities. Meeting notices will be sent with a request to post them so residents can be made aware of the planning process.

During declared emergencies such as pandemics or natural disasters, the requirement to publish the notice and summary in a newspaper of general circulation described above may be suspended. The City shall at a minimum publish public notices on the City of Reno's website and promote such advertisements on social media as available. Furthermore, a shorter period for notification may be allowable by HUD waivers. The timelines adopted will be those established by HUD at the time.

Relevant Geographic Areas and Programs

The Community Resources Division of the City of Reno is responsible for the development and implementation of this Citizen Participation Plan. The City of Reno, the City of Sparks, and Washoe County participate in the WCHC, for affordable housing throughout the region.

The Washoe County HOME Consortium receives formula grant monies directly from HUD through the HOME Investment Partnership Program (HOME). The City of Reno receives Community Development Block Grant (CDBG) and Emergency Shelter Grant (ESG) funding as an entitlement community. All proposals to use CDBG, HOME and ESG shall provide a written description of efforts to minimize displacement of existing low-income residents, if applicable.

Exhibit 1 presents estimates of the HUD formula funding available to WCHC projects and the City of Reno public infrastructure, economic development, and public service projects, on average, for each federal program year.

Exhibit 1. Average Annual HUD Block Grant Funding, Reno and Washoe County. Source: City of Reno.

	CDBG	ESG	HOME
Direct Allocation	\$2 million	\$90,000	\$1.6 million
Program Income	\$50,000	\$0	\$50,000
Other-specified	\$0	\$0	\$0

The City also receives an allocation of ESG from the State and the WCHC receives a pro-rata award of HOME and Low Income Housing Trust Funds (LIHTF) through the State Housing Division.

Citizen Involvement—Consolidated Plan, Action Plan, AI and CAPER

The City of Reno Consolidated Planning processes will offer many opportunities for citizen participation. The City will particularly encourage participation of persons with special needs and/or persons who are often underrepresented in public process, i.e. low income, persons of color, non-English speaking persons, persons with disabilities, persons who are homeless. Participation will be solicited and encouraged through the following activities.

At least six months prior to the end of the period covered by the five-year Consolidated Plan, the jurisdictions will initiate a public planning process to develop a new Consolidated Plan. Citizens, public agencies, non-profit agencies and other interested parties will be provided reasonable notice of meetings (held in convenient locations) and given the opportunity to have input and comment on the plan. The public will be provided with information that estimates the amount of available funding as well as the range of activities that may be undertaken with these funds. Those interested in participating will have input into the setting of community needs and priorities (see below). A hearing will be held to take comments on the draft plans; copies of any draft plan will be made available to the public upon request.

Citizen participation hearings—Consolidated Plan and Action Plan

There will be at least two public hearings held at two different stages of the program year to obtain citizens' views and to respond to proposals. Together, the hearings will address housing and community development needs, development of proposed activities, and review of program performance. Public hearings shall be at locations that are ADA accessible and convenient to a large segment of the community's low-income population. Not less than 10 business days prior to a scheduled public hearing, the City shall publish a display style notice in local newspapers. The notice shall include the date, time, place, and purpose of the public hearing, as well as where and how interested persons can receive more information.

The City's TTY number shall be included at the end of the public hearing notice. In addition, a copy of the public hearing notice shall be posted at Reno City Hall. A notice of public hearing shall be mailed to any person who requests such notice either orally or in writing. When the City anticipates or is informed with adequate notice that non-English speaking or hearing impaired persons will attend the hearing, they shall take reasonable steps to arrange to have an interpreter at the hearing.

During declared emergencies such as pandemics or natural disasters, public meetings and hearings may be held in an online capacity as allowed by HUD. In this situation, the ability for public comment will be provided.

Community meetings—Five year Consolidated Plan and AI

During development of the five-year Consolidated Plan and AI (which may occur at separate times), at least two public meetings—one targeted to residents and one targeted to stakeholders—will be held during the development of the Plan to identify unmet housing needs in Reno, Sparks and the County and community development needs within the City of Reno. The meetings will also provide an opportunity for citizens and interested parties to obtain information about the City’s housing and community development programs and eligibility requirements. City staff will be available at the forums to provide technical assistance for developing funding proposals for the programs covered by the Consolidated Plan.

The meetings will be held at various times during the day to accommodate persons who rely on public transportation and/or are not comfortable driving at night, working residents and residents with varied schedules. The forum locations will be distributed throughout the region, with an emphasis on low and moderate-income areas.

Residents will be informed of the meeting using many methods, including distribution of brochures, personal contact with agencies and advocates and media releases. All sites selected for the meetings are accessible to the physically disabled.

Public Comment

As outlined below, each required report/plan/amendment is listed with the minimum number of days required for advance notice to the public in order to allow citizens to respond or comment:

- Consolidated Plan—30 days
- Annual Action Plan—30 days
- Amendment to the Annual Action Plan/Consolidated Plan—30 days
- Amendment to the Annual Action Plan/Consolidated Plan in response to a disaster declaration - 5 days
- Amendment to the Citizen Participation Plan—30 days
- Amendment to the Citizen Participation Plan in response to a disaster declaration - 5 days
- Annual Performance and Evaluation Report (CAPER)—15 days

The required display style notices will be placed in a local newspaper. The notice shall identify the report/plan/amendment, when and where it will be available for public review, the deadline to submit comments and where such comments should be sent. When requested, the City will take reasonable steps to provide the report/plan/amendment in other forms accessible to persons with disabilities. Views of citizens and service providers that are received in writing shall be considered prior to final approval of the applicable report/plan/amendment. A summary of any comments and responses to those comments shall be attached to the final report/plan/amendment submitted to HUD.

During declared emergencies, such as pandemics or natural disasters, the public comment period may be shortened, as described by HUD, to as little as five (5) days to accelerate the

process. In these cases, public documents will be made available on the City of Reno's website only.

Consultation with stakeholder organizations

When preparing the Consolidated Plan, the City will actively consult with public and private agencies that provide housing, health and social services in order to ensure that the interests and needs of all groups are being adequately addressed. This consultation will occur through the regional forums, interviews conducted with such organizations including those that provide services to special needs populations and incorporation of data and reports produced by such organizations into the Consolidated Plan.

Annual Action Planning and Allocation Processes

This section describes the planning and fund allocation process associated with the activities that are considered for funding. It is organized by type of activity.

Washoe County HOME Consortium (WCHC)

Applications. Prior to releasing the Affordable Housing Municipal Loan Program (AHMLP) applications, participating jurisdictions may hold public meetings to establish funding priorities. Any priorities established by the jurisdictions will become part of the annual AHMLP funding application document. The funding application is typically released in the fall. Not less than 60 days before the deadline (typically in December) to submit applications for eligible affordable housing development and Community Housing Development Program (CHDO) activities, the WCHC Lead Agency, the City of Reno, shall place a public notice in ethnic and local newspapers regarding the availability of funds and the application process. The notice shall state when and where applications will be made available, the deadline for submitting applications, and who to contact for more information. Applications shall be mailed to any person or organization upon request, or provided in an electronic format. .

Allocation process. It is the intent of the WCHC to conduct one funding round annually. Should a balance of approximately \$500,000.00 remain, a second funding round may be held. If no projects meeting WCHC goals are submitted the WCHC may elect to not allocate funds and instead issue a request for proposals for a project addressing WCHC goals. Loan decisions regarding funding requests for proposed affordable housing development projects, for CHDO set aside funds, and for CHDO operating expenses, are made in accordance with the following process:

Priorities/Funding: Priorities/goals will be included in the WCHC Annual Plan and the annual AHMLP document. The AHMLP process opens in fall and closes in the winter. All applications are forwarded to the Technical Review Committee (TRC) to hold public hearings on the applications. The TRC will make recommendations for funding in March. Then, the WCHC Directors (City/County Managers) acts on the TRC recommendations. The recommendations approved by the Directors are forwarded to the Regional Planning Governing board, RPGB, (multi-jurisdictional review body consisting of elected officials) for ratification.

ANNUAL CALENDAR

(Actual dates change each year; verify with staff¹)

Washoe County HOME Consortium Allocation Process²

October	Applications available
December	Applications due
January/March	Public meetings and hearings on applications received
March	Technical Review Committee recommends allocations
March/ April	City/County Managers recommends allocations
April	Regional Planning Governing Board ratifies allocations

Substantial Amendments

Occasionally, public comments warrant an amendment to the Consolidated Plan. The criteria for whether to amend is referred to by HUD as “Substantial Amendment Criteria.” The following conditions are considered to be Substantial Amendment Criteria for the Reno Consolidated Plans:

1. Changes in the use of CDBG, HOME and ESG funds from one eligible project to another, and which results in a 25% change in funding from one project to another (i.e., housing to economic development or public services to public facility); or
2. Adds or deletes a project on the adopted list of priority needs; or
3. Increases or decreases funds to a project by more than 10% of the Cities’ grant allocation. Adjustments in funding levels for public service, administration and housing activities due to differences in actual versus anticipated program income shall not be considered substantial; or
4. Changes to the identified priority needs or goals of the Consolidated Plan; or
5. Changes to the geographic allocation process.

Minor Amendments shall be made administratively and incorporated into the CAPER at the end of each program year. A minor amendment is defined as one that maintains the integrity of the plan while providing flexibility in meeting the stated goals and objectives.

Citizen participation in the event of a substantial amendment. Substantial Amendments shall be made available for public review as outlined in the Public Comment section of this plan. Minor Amendments to the plan that comply with minimum HUD requirements shall be incorporated administratively.

¹ City of Reno: 334-2218

² Call in April to determine if there will be a second allocation process: 334-2578

In the event of substantial amendments to the Consolidated Plan, the city will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing or during public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the Final Consolidated Plan. Also included in the Final Consolidated Plan will be a summary of all comments not accepted and their reasons for dismissal.

Changes in federal funding level. Any changes in federal funding level after the Draft Consolidated Plan's comment period has expired and the resulting effect on the distribution of funds, will not be considered an amendment or a substantial amendment.

Access to Records

A copy of the Reno Consolidated Plan, the Annual Action Plan, and the CAPER reports for the preceding five years shall be made available for review by the public during normal business hours at City of Reno City Hall, 1 East 1st 12th floor. Copies of these plans and reports for the current year will be made available for distribution to the public at no charge. Also upon request, the City will take reasonable steps to provide the documents in other forms accessible to persons with disabilities.

During declared emergencies, such as pandemics or natural disasters, the public comment period may be shortened, as described by HUD, to as little as five (5) days to accelerate the process. In these cases, public documents will be made available on the City of Reno's website only.

Technical Assistance

The City of Reno will be available during business hours to answer questions and provide technical assistance to citizens, public agencies and other interested parties in developing proposals for funding under any of the programs covered by the Consolidated Plan. Applicants are encouraged to contact the staff prior to the submission of application materials to ensure that the proposal meets program eligibility requirements. Calls can be made to the City of Reno Housing and Neighborhood Development Division at 774-334-2578, and emails can be sent to housing@reno.gov.

Complaints

Complaints from citizens related to the Consolidated Plan, the Annual Action Plan, the Annual Performance Report, or any substantial amendments should be filed in writing at:

Community Resources
City of Reno
P.O. Box 1900
Reno, Nevada 89505

Persons filing complaints shall be specific, noting the nature of the complaint and the requested resolution of the problem. All complaints which are signed, and which provide a return address, will be responded to in writing within 15 working days, when practical. When the resolution proposed is not accepted, an explanation for not accepting the proposed resolution will be provided. If the complaint cannot be resolved locally, persons filing complaints may contact the HUD field office in writing at:

Community Planning and Development Division
U.S. Department of Housing and Urban Development
One Sansome Street, Suite 1200
San Francisco, CA 94101-4430