



# **City of Laredo, Texas**

## **Citizen Participation Plan**

AMENDED DECEMBER 2024

# **CITY OF LAREDO**

## **CITIZEN PARTICIPATION PLAN**

The City of Laredo is identified as an Entitlement City by the U.S. Department of Housing and Urban Development (HUD), and consequently, receives funding annually through the Community Development Block Grant (CDBG), the HOME Investment Partnership Program and the Emergency Shelter/Solutions Grant (ESG). The amount of each CDBG, HOME, and ESG entitlement is determined by statutory formula. Within the statutory constraints of each of the HUD programs, the City of Laredo is able to develop its own programs and funding priorities.

It is the policy of City of Laredo to ensure adequate citizen involvement in the planning, implementation, and evaluation of its housing and community development programs. The City of Laredo has developed this Citizen Participation Plan in an effort to encourage citizen participation for its HUD programs, specifically in the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report.

In application for funding through these programs, the City of Laredo is required to develop and submit to the U.S. Department of Housing and Urban Development, Assessment of Fair Housing, Consolidated Plan, Annual Action Plan which identifies the housing and non-housing funding priorities of the community and the specific activities to be carried out with CDBG, HOME, and ESG funds. In developing the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, the City is charged with the responsibility of consulting with local citizens, community service organizations, and others as applicable in assessing needs and determining the best use of program funds.

The City of Laredo has amended its Citizen Participation Plan to adhere with 24 CFR Part 91.105 (pertaining to the Consolidated Submission for Community Planning and Development Programs) and 24 CFR Part 5 (the grantee's obligation to Affirmatively Further Fair Housing (AFFH)). Also, in accordance with 24 CFR Part 91.103 (3), the City will provide this Plan in a format that is accessible to persons with disabilities, upon request. The City's policies and procedures to encourage and allow for citizen participation in the development and submission of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, any substantial amendments to the plans and the performance report.

### **I. ENCOURAGEMENT OF CITIZEN PARTICIPATION**

- A. The City of Laredo shall take appropriate action to encourage the participation of all its citizens in the development of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, and any substantial amendments to the plans, and on the performance report.

- B. Particular emphasis will be placed on encouraging the participation of protected classes, low-and moderate-income persons, and particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used. The City of Laredo will take whatever action is appropriate in the encouragement of the participation of all its citizens, including minorities and non-English speaking persons as well as persons with disabilities.

Consultations, direct mailings/emails and/or other contact will be made with local and regional organizations that serve those in protected classes, or that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

- C. The City shall encourage, in conjunction with consultation with the Laredo Housing Authority, the participation of residents of public and assisted housing developments, in the process of developing and implementing the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, along with other low-income residents of targeted revitalization areas in which the developments are located. During the consultation process, coordinated emphasis will be made to achieve comprehensive community development goals and ensure strategies and actions are taken to affirmatively further fair housing. Moreover, local and regional fair housing organizations and enforcement agencies will be consulted with.
- D. The City shall provide citizens with a reasonable opportunity to comment on the development and submission of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, any substantial amendments to the plans and the performance report. The citizen participation plan shall be in a format accessible to persons with disabilities, upon request.
- E. In the event of a local or national emergency, the City will undertake other steps feasible in order to encourage citizen participation.
- F. In the event of a local or national emergency, only if stated by HUD in each situation, ESG funds will not be subject to the citizen participation requirement. However, the City will publish on its website how the ESG funds will be utilized.

## II. DEVELOPMENT OF THE ASSESSMENT OF FAIR HOUSING, CONSOLIDATED PLAN, ANNUAL ACTION PLAN

- A. Before adopting the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, the City will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the City is expected to receive (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.

- B. City staff charged with the responsibility of preparing the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan will meet and request input from local citizens, service organizations, the Public Housing Authority, and other interested parties, when feasible, through:
1. Neighborhood meetings held in each of the City's regions (North, South, East, and West), will be schedules in a timely fashion to allow for sufficient time for preparation of the plan. Social Media sources and/or online platforms may be used when necessary.
  2. At least one public hearing will be held at a location easily accessible to all, prior to the development of the plan in order to obtain the views of citizens on housing and community development needs, including priority non-housing community development needs. Social Media sources and/or online platforms may be used when necessary.
  3. Scheduled meetings with service organizations, the Public Housing Authority, and others as necessary. Social Media sources and/or online platforms may be used when necessary.

In case of a local and/or national emergency, the City will undertake other feasible steps to encourage citizen participation. These steps could include but are not subject to or limited to:

1. Online live meetings such as City Council meetings and/or department organized meetings, through social media or other online platforms.
  2. Availability of an office land line and/or City e-mail account.
  3. Availability of a Community Needs Survey via de City of Laredo website
  4. Availability of receiving oral and/or written comments at the City of Laredo Community Development Department physical office located at:  
1301 Farragut, Transit Center Building, 3<sup>rd</sup> Floor, East Wing  
Laredo, TX 78042
- C. At the time the proposed plan is made available for public comment, a summary of the proposed Assessment of Fair Housing, Consolidated Plan, Annual Action Plan will be published in the Laredo Morning Times or other local newspaper which maintains the greatest circulation.
- D. Paper copies of the complete Assessment of Fair Housing, Consolidated Plan, Annual Action Plan will be made available at City Offices and local libraries, for public review for a 30 day period. In case of a local and/or national emergency, the comment period is reduced to not less than 5 days or as directed by HUD in each situation.

Notice will be given through the Laredo Morning Times or other newspaper of greatest circulation; the Public Access Channel, and/or TV regarding the comment period.

- E. A reasonable number of copies of the proposed Assessment of Fair Housing, Consolidated Plan, Annual Action Plan will be made available free of charge to citizens and groups who request it.
- F. A public hearing noting the proposed activities to be carried out with CDBG, HOME, and ESG funds will be held before a request is made for City Council authorization to submit the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan to HUD.
- G. In preparing the final Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, City staff will consider any comments or views of citizens received in writing or orally at public hearings/meetings. A summary of these comments or views, and a summary of any comments or views and the reasons therefore, shall be made part of the final Assessment of Fair Housing, Consolidated Plan, Annual Action Plan.

### III. DISPLACEMENT OF PERSONS

The City of Laredo does not anticipate any displacement to occur as a result of any HUD funded activities. All programs will be carried out in such a manner as to safeguard that no displacement occurs. However, in the event that a project involving displacement is mandated in order to address a concern for the general public's health and welfare, the City will take the following steps:

- A. A public hearing will be held to allow interested citizens an opportunity to comment on the proposed project and voice any concerns regarding possible relocation. Notice of the public hearing/meeting will be made as per the procedure noted in a separate section of the Citizen Participation Plan.
- B. In the event that a project involving displacement is pursued, the Community Development or other City staff will contact each person/household/business in the project area and/or hold block meetings, depending on the project size; inform persons of the project and their rights under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and respond to any questions or concerns.
- C. Relocation assistance will be provided in adherence with the City's Project Relocation Plan and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

#### IV. SUBSTANTIAL AMENDMENTS

In the event that substantial amendments to the Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan are found necessary a notice will be published by the same procedures indicated above for a thirty (30) day comment period and a public hearing. In case of a local and/or national emergency, the comment period is reduced to not less than 5 days or as directed by HUD in each situation. Any written or oral comments received will be considered and a summary will be attached to the substantial amendment of the Assessment of Fair Housing, Consolidated Plan/ and or Annual Action Plan.

A substantial amendment shall be defined as any one or more of the following:

1. A change in the fair housing goals in the Assessment of Fair Housing Plan,
  2. Any addition or deletion of the established priorities or activities described in the Consolidated Plan/ and or Annual Action Plan,
  3. Any change in the purpose, location or beneficiaries of an identified CDBG, HOME, HOME-ARP and ESG funds project or activity providing for the addition/deletion of a project including the purpose, scope, location or beneficiary of an activity,
  4. A change in the scope of an activity, such that an increase or transfer in the funding of a previously disclosed CDBG, HOME, or HOME-ARP activity, if the additional allocation, increase or transfer equals or exceeds \$750,000; for ESG activities when increase or transfer equals or exceeds \$50,000. In case of a local and/or national emergency, the ESG allocation, increase or transfer must equal or exceed \$500,000 to trigger a substantial amendment.
  5. A change in allocation priorities or a change in the method of distribution of funds.
- A. City staff will insure that citizens and interested groups have an opportunity to comment on any substantial amendments to the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan.
1. Notice of the proposed substantial amendment and request for comment will be made through the Laredo Morning Times or other newspaper of greatest circulation.
  2. Citizens will be provided a 30 day comment period to express views regarding the substantial amendment before the amendment is implemented. In case of a local and/or national emergency, the comment period is reduced to not less than 5 days or as directed by HUD in each situation. Copies of the substantial amendment will be made available at the Dept. of Community Development, the office of the City Secretary, and at the public library.

3. In preparing the substantial amendment, City staff will consider any comments or views of citizens received in writing or orally. Comments can be addressed to :

Director:  
Department of Community Development  
1301 Farragut, Transit Center Building, 3<sup>rd</sup> Floor, East Wing  
Laredo, TX 78042

*Or be mailed to:*  
P.O. Box 1276  
Laredo, TX 78042

4. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be made part of the substantial amendment to the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan.

## V. PERFORMANCE REPORTS

The City will also will prepare a performance report for submission to HUD on an annual basis which is due within ninety (90) days of the close of the program year. This report, called the Consolidated Annual Performance and Evaluation Report (CAPER), shall be made available at the Community Development Department, on the City's web page at [www.ci.laredo.tx.us](http://www.ci.laredo.tx.us), and made available at public buildings for review by the public for no less than fifteen (15) days before the City submits the report to HUD.

- A. Notice of each annual performance report and request for comment shall be made through the Laredo Morning Times or other newspaper of greatest circulation.
- B. Citizens will be provided a 15 day comment period to express views regarding the performance report before the report is submitted to the U.S. Department of Housing and Urban Development. Copies of the performance report will be made available at the Department of Community Development, at the office of the City Secretary, and at the Laredo Public Library.
- B. In preparing the performance report, City staff shall consider any comments or views of citizens received in writing or orally. Comments can be addressed to:

Director  
Department of Community Development  
1301 Farragut, Transit Center Building, 3<sup>rd</sup> Floor, East Wing  
Laredo, TX 78042

*Or be mailed to:*  
P.O. Box 1276  
Laredo, TX 78042

## VI. PUBLIC HEARINGS/MEETINGS

Public hearings will be held at least twice per year at key stages of the process to obtain the public's views and to provide the public, to the greatest extent possible, with responses to their questions and comments. The City holds public hearings to obtain input regarding community needs during the development of the Assessment of Fair Housing and Consolidated Plan; to review proposed uses of the funds in each Annual Action Plan; and to review program performance in the Consolidated Annual Performance and Evaluation Report.

The City will hold at least two public hearings prior to the submission of the Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan to HUD.

The initial public hearing will be held before the Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan is published for comment. This will be both an informational session and an opportunity for citizens to comment on the housing and community development needs in the City.

In case of a local and/or national emergency, only one public hearing for amendments will be conducted to expedite the process.

Citizens will be provided with reasonable and timely access to local meetings, information, and records relating to the Assessment of Fair Housing and Consolidated Plan, and Annual Action Plan, with the City's proposed and actual use of Community Development Block Grant, HOME Investment Partnerships Program, HOME-ARP and Emergency Shelter/Solutions Grant funds, through the following actions:

### A. Schedule of Public Hearings/Meetings

1. The City will hold at least 2 public hearings each fiscal year to obtain citizens' views and to respond to proposals and questions to be conducted at a minimum of two different stages of the program year. In case of a local and/or national emergency, only one public hearing will be conducted to expedite the process. The hearings shall address:
  - a. Housing and community development needs. In order for the City to obtain views of citizens on housing and community development needs, including priority non-housing community development needs, the at least one of these hearings must be held before the proposed Assessment of Fair Housing, Consolidated Plan, Annual Action Plan is published for comment.
  - b. Development of proposed projects, and
  - c. Review of program performance.

2. If a hearing is scheduled as part of a City Council meeting, a notice of the public hearing will be included in the City Council agenda which will also be posted by the City Secretary 72 hours prior to the meeting date.
  3. When feasible, public hearings will be held at times and location convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities.
    - a. The City will insure that meeting locations are centrally located, accessible by both private and public transportation, and present no barriers to persons with disabilities.
    - b. Upon timely notice (at least 72 hours), City staff will make special arrangements for persons who are hearing impaired or have a special need.
    - c. The City shall ensure that non-English speaking residents be presented with an opportunity to participate and comment in public hearings by conducting, upon request, the hearing in Spanish.
  4. Additional public hearings can and will be held upon the request of City Council and/or concerned citizen requests to City Council.
  5. When feasible, the City shall ensure that public meetings be held in neighborhoods that are in CDBG target areas in order to obtain citizen's views and to respond to proposals and questions.
  6. Advertisement of public meetings shall be made both in English and Spanish in order to afford non-English speakers an opportunity to be aware of public meetings. When feasible, advertisements will be in the local newspaper of greatest circulation at least 2 weeks prior to the date of the meeting in order to provide timely notice to neighborhood residents. In case of a local and/or national emergency, a notification of no less than three days will be provided to neighborhood residents in order to expedite the process.
  7. As appropriate, press releases will be issued through TV, to announce special scheduled meetings.
  8. As appropriate, flyers noting a neighborhood meeting's purpose and scheduled time shall be distributed at locations frequented by affected residents (i.e. neighborhood schools, recreation centers, housing authority, etc...)
  9. The Public Access Channel shall be utilized to broadcast information about the Assessment of Fair Housing, Consolidated Plan and Annual Action Plan meetings, etc... in both English and Spanish.
- B. When feasible, the intended use of the Community Development Block Grant Program, the HOME Investment Partnership Program, and the Emergency

Shelter/Solutions Grant and other applicable HUD program funds will be publicized by and through:

1. Public Hearing. Prior to the request by staff that City Council approve the proposed Consolidated Plan, a hearing will be held, and the specific projects proposed to be carried out will be identified.
2. Neighborhood meetings. Residents will be encouraged to attend and learn of the proposed and ongoing activities of the City, including the projects/programs funded and proposed to be funded through CDBG, HOME, HOME-ARP and ESG programs, at neighborhood meetings held prior to the start of the fiscal year.
3. City Council Budget Hearings. Proposed CDBG, ESG, HOME-ARP and HOME budgets are discussed at City Council Budget Hearings, which are held approximately 60 days prior to the start of the new fiscal year. They are open to the public.

C. In case of a local and/or national emergency, or in the case where health authorities recommend social distancing and/or limit public gatherings for public health reasons, the City will undertake other feasible steps to conduct a public hearing and/or meeting. These steps could include but are not subject to or limited to:

1. Online live (real-time) public hearings and/or meetings such as City Council meetings and/or department organized meetings, through social media or other online platforms.
2. Hosting only one public hearing at a City Council meeting and conducting a motion to approve the emergency item after the public hearing is closed if no substantial comments are received during the public hearing on that same day.

If online hearings and/or meetings are conducted, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

## VII. PUBLIC COMMENT/AVAILABILITY TO THE PUBLIC

The draft Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan will be made available for public comment for a minimum of thirty (30) days. In case of a local and/or national emergency, the comment period is reduced to not less than 5 days or as directed by HUD in each situation. A notice of the public comment period, the locations where the plan is available for review, and a summary of the plan will be published in a newspaper of general circulation and will also be posted at the City Office Building and in other places frequented by the public, especially low- and moderate-income persons and persons benefiting from or affected by proposed CDBG activities. The notice of the public comment period, as well as the draft, will be posted on the City's website at [www.ci.laredo.tx.us](http://www.ci.laredo.tx.us). Additionally, direct outreach to local and

regional organizations that serve those in protected classes, assisted housing providers, public housing agencies, social service agencies, and advocacy groups, as well as their beneficiaries, will be utilized to broaden the efforts to notify all.

A reasonable number of free copies of the plan will be available upon request by calling or visiting the City's Community Development Department during regular business hours. During the comment period, at least one public hearing will be held. In case of a local and/or national emergency, the public hearing does not need to be held during the comment period; it can be held after the comment period is over.

A summary of the written and/or oral comments and the response to those comments will be included in the Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan.

**A. Plan Approval:**

The draft Assessment of Fair Housing, Consolidated Plan and/or Annual Action Plan will be presented to the City Council for approval before it is submitted to HUD. The presentations will be made during regularly scheduled Board meetings which are open public meetings and broadcast live.

**B. Substantial Amendments Approval:** In case of a local and/or national emergency, a public hearing followed by an approval motion for submission to HUD will occur on the same day during the City Council meeting

City Council meetings will be aired through the Public Access Channel for the purpose of allowing all residents of the community to be informed of City Council Action.

1. The Assessment of Fair Housing, Consolidated Plan, and Annual Action Plan, as adopted, substantial amendments, and the annual performance report, shall be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request, at the offices of the Department of Community Development.
2. It is the City's policy that all information required to be made public by the Texas Open Records Act, be made available for public review in accordance with Chapter 552 of the Texas Government Code. The City of Laredo will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the City's Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, and the City's use of assistance under the programs covered by 24 CFR 91 during the preceding 5 years.

## **IX. TECHNICAL ASSISTANCE**

Technical Assistance shall be provided to groups representing persons of low and moderate income that request assistance in developing proposals, be it for CDBG, HOME , ESG or other projects covered under the Assessment of Fair Housing, Consolidated Plan and Annual Action Plan.

- A. City staff shall meet with group representatives informally as well as formally, to discuss program needs and provide guidance as applicable.
- B. City staff shall coordinate with other City Departments to ascertain information needed and/or requested by group representatives.

## X. COMPLAINTS

- A. The City of Laredo maintains an Open Door Policy and encourages citizens to express their needs and issues of concern. All grievances shall be addressed in a courteous and timely manner.
- B. Oral complaints will be addressed by the staff person receiving the complaint. If the complaint is not addressed to the satisfaction of the complainant, then the concern will be referred to the staff person's supervisor. If the complainant is still not satisfied, then the concern will be addressed by the Community Development Director. The nature of the complaint will be documented for further reference in the 311 Customer Service system or other complaint documentation system, as appropriate.
- C. Written complaints will be addressed through a formal written response for the Assessment of Fair Housing, Consolidated Plan, and Annual Action Plan, any amendments and the Consolidated Annual Performance and Evaluation Report. Staff will respond to such complaints in writing within 15 working days after having received the complaint.

## XI. NEEDS OF NON-ENGLISH SPEAKING RESIDENTS

City staff will accommodate the needs of non-English speaking residents to insure their participation. If non-English speaking or hearing impaired residents request assistance to participate in a public hearing, the City will make arrangements to have an interpreter present given reasonable advanced notice. Instructions for making such request will be outlined in the public notice.

- A. Newspaper notices regarding all HUD funded activities administered by the City, substantial amendments, and performance reports will be published both in English and in Spanish.
- B. Depending on the needs of the residents in attendance, staff will insure that public hearings are conducted in English and/or Spanish, as appropriate.
- C. Public comments will be received both in English and in Spanish during City Council meetings where the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, substantial amendments, and the performance report are discussed.

## XI. OTHER

- A. The City of Laredo reserves the right to amend its Citizen Participation Plan as it relates to its HUD grants, as necessary, in order to meet the needs of citizens of the community and changes in program requirements.
- B. Following City Council's approval of the amended Citizen Participation Plan, the City of Laredo is responsible for adhering, to the greatest extent feasible, to the citizen participation policies and procedures, as noted, in regard to the development and submission of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan, Substantial Amendments, and Performance Report.
- C. In case of a local and/or national emergency, the City of Laredo will abide by the regulations provided by HUD and may utilize the waivers provided by HUD for each grant.
- D. The Citizen Participation Plan, as amended, does not restrict the responsibility or authority of the jurisdiction for the development and execution of the Assessment of Fair Housing, Consolidated Plan, Annual Action Plan.