

CITY OF TUCSON-PIMA COUNTY CONSORTIUM CITIZEN PARTICIPATION PLAN

This plan describes how citizens can participate in an advisory role in the planning, implementation, and assessment of the City of Tucson-Pima County Consortium HUD 5-year Consolidated Plan, Assessment of Fair Housing, Annual Action Plans, and Consolidated Annual Performance Reports

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INTRODUCTION

This Citizen Participation Plan has been prepared to provide Tucson and Pima County residents an opportunity to participate in an advisory role in the planning, implementation, and assessment of:

1. The City of Tucson-Pima County Consortium 5-Year HUD Consolidated Plan;
2. City of Tucson and Pima County HUD Annual Action Plans;
3. City of Tucson and Pima County HUD Consolidated Annual Performance Reports (CAPER); and
4. The City of Tucson-Pima County Consortium Assessment of Fair Housing (AFH), when applicable.

By completing these planning and assessment documents, the City of Tucson – Pima County Consortium (Consortium) receives an annual allocation of HOME Investment Partnerships (HOME) funding from the US Department of Housing and Urban Development Office of Community Planning and Development (HUD CPD). In addition to HOME funds received by the Consortium, the City of Tucson receives Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with AIDS (HOPWA) funding and Pima County receives CDBG and ESG funding. Both the City of Tucson and Pima County may also utilize NSP Program Income or participate in the Section 108 Loan Guarantee program.

ENCOURAGING CITIZEN PARTICIPATION

The Consolidated Planning process offers opportunities for resident participation through public meetings and hearings, public notices, and review of draft documents. Opportunities to comment on or participate in the planning community development and affordable housing activities and projects will be publicized and disseminated as widely as possible throughout Pima County and Tucson, and partner organizations will be asked to encourage participation of the populations they serve. The Consortium will take appropriate actions to encourage the participation of all its citizens including:

- Low- and moderate-income persons, as measured by the county's AMI, particularly those living in areas designated as a target area or revitalization area and in areas where federal funds are proposed to be used;
- Residents of predominantly low- and moderate-income neighborhoods, where more than 51% of the residents are low- and moderate-income as measured by the county's AMI;
- Minorities;

- People with Limited English Proficiency (LED);
- People with disabilities;
- People who are experiencing homelessness;
- Residents of public and other assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations; and
- Local and regional institutions, program partners, the regional Continuum of Care (COC), and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

The City of Tucson-Pima County Consortium 5-Year HUD Consolidated Plan

The 5-Year Consolidated Plan provides a framework for identifying affordable housing, homeless/ special needs, and community development priorities, and guidance for how HUD CPD funds will be invested in Tucson and Pima County. The 5-Year Consolidated Plan is prepared by May of a given year.

Consultation

In preparing the 5-year Consolidated Plan, the Consortium will:

- Consult with CDBG Target areas, partner organizations including the Housing Commission, the Tucson-Pima Collaboration to End Homelessness, and incorporated jurisdictions in Pima County, and other organizations necessary to fulfill consultation requirements.
- Solicit input through online surveys publicized on the City and County website and social media, and supplemented by mass emails to City and County stakeholders and Neighborhood Associations registered with the City of Tucson.
- Consult with public housing residents, and low-income residents of targeted revitalization areas in which federal projects are anticipated.
- Make the Plan available to local housing authorities on a continuing basis and for public meetings/hearings to be held under HUD Capital Grant Program or Public Housing Agency Plan established pursuant to 24 CFR Part 903.
- Provide a limited number of free printed copies for those who request it.

Public Meetings and Hearings

The Consortium will hold at least one public meeting and one public hearing for input on the 5-Year Consolidated Plan. At least one public meeting will be held during Plan formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors public

hearing will be held once the draft Plan has been completed. The public meetings/hearings will address:

- The amount of HUD funds covered by the Consolidated Plan anticipated to be made available on a fiscal year basis, the amount of funds anticipated to benefit low- and moderate-income persons, and the eligible range of activities that may be undertaken concerning such federal programs.
- The range of activities that may be undertaken with the funding being discussed.
- Priorities for affordable housing, homeless and special needs populations, and community development in Tucson and Pima County.
- Plans to minimize the displacement of persons assisted through the use of HUD CPD funds.
- Other aspects of the 5-Year Consolidated Plan, as applicable.

Public meetings/ hearings will be held at accessible locations and times determined by the Consortium with consideration made for public convenience. The Consortium may utilize alternative public involvement techniques, such as the use of the Internet and/or virtual meetings or hearings.

Public Comment Period

On or before April 10 of any given year, the Consortium will make available the draft 5-Year Consolidated Plan for a 30-day public comment period.

In accordance with HUD guidance issued on April 9, 2020, the Consortium may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Annual Action Plans

Annual Action Plans are prepared by the City and County by May of each year and describe the planned investment of the HUD CPD resources for the coming year (July 1 – June 30). The City of Tucson Annual Action Plan includes HOME funds for the Consortium.

City of Tucson Consultation

In preparing the Annual Action Plan, the City of Tucson will:

- Consult with CDBG Target areas, partner organizations including the Metropolitan Housing Commission, the Tucson-Pima Collaboration to End Homelessness and other organizations as necessary to fulfill consultation requirements.

- Provide a limited number of free printed copies for those who request it.

Pima County Consultation

Prior to beginning a new program year and in preparing the Annual Action Plan, Pima County will:

- Hold up to fifteen public hearings, meetings and/or workshops to solicit public input on the past year's project performance and recommendations for new project allocations for the upcoming program year.
- Hold meetings in identified CDBG target areas to discuss target area needs and eligible uses of CDBG funds relative to identified needs.
- Provide a limited number of free printed copies for those who request it.

City of Tucson and Pima County Public Meetings and Hearings

The Consortium members will respectively hold at least one public meeting and one public hearing for input on the Annual Action Plans. At least one public meeting will be held during Plan formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors public hearing will be held once the draft Plans have been completed. As subrecipients of Pima County CDBG funding, the Town of Marana and City of South Tucson Councils will hold public meetings. The public meetings/hearings will address:

- The amount of HUD CPD funds anticipated to be made available on a fiscal year basis, and the eligible range of activities that may be undertaken concerning such federal programs.
- Priorities for affordable housing, homeless and special needs populations, and community development.
- The anticipated uses of CDBG, ESG, HOME, HOPWA *and* NSP funds, as applicable.
- Other aspects of the Annual Action Plan, as applicable.

The Consortium and subrecipients may utilize alternative public involvement techniques, such as the use of the Internet and/or hold virtual meetings or hearings.

City of Tucson and Pima County Public Comment Period

On or before April 10 of any given year, the Consortium members will make available the draft Annual Action Plans for a 30-day public comment period.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan,

Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Consolidated Annual Performance Report

Consolidated Annual Performance Reports (CAPER) are prepared by the City and County by September of each year and describe the actual investment of HUD CPD resources during the prior year. The City of Tucson CAPER includes HOME funds for the Consortium.

On or around September 1 of any given year, the Consortium members will make available the draft Comprehensive Annual Performance Evaluation Reports (CAPER) for a 15-day public comment period.

The City of Tucson-Pima County Consortium Assessment of Fair Housing (AFH)

The Assessment of Fair Housing (AFH) replaces the Analysis of Impediments to Fair Housing Choice (AI). The AFH will assist the Consortium in identifying fair housing issues and contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. If applicable, a draft of the AFH will be prepared by the Consortium by May of the year prior to preparation of the 5-year Consolidated Plan.

Consultation

The Consortium will consult with community-based and regionally-based organizations representing protected class members, and organizations that enforce fair housing laws, including participants in the Fair Housing Assistance Program (FHAP), Fair housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP), and other public and private fair housing service agencies, to the extent that such entities operate within Pima County.

As soon as feasible after the start of the public participation process, the Consortium members will make available HUD-provided data and any other supplemental information the Consortium members plan to incorporate into the AFH to residents, public agencies and other interested parties.

This consultation will help provide a better basis for the AFH, the City and County certifications to affirmatively further fair housing, and other portions of the Consolidated Plan concerning affirmatively furthering fair housing. This consultation will occur with any organizations the City and County can identify that have relevant knowledge or data to inform the AFH.

To the greatest extent practicable, the organizations involved in the consultations will be sufficiently independent and representative to provide meaningful feedback on the AFH and its implementation. The consortium will consult with the above referenced organizations in the development of both the AFH and the Consolidated Plan; consultation on the Consolidated Plan will seek input into how the goals identified in an accepted AFH inform the priorities and objectives of the Consolidated Plan.

Public Meetings and Hearings

The Consortium will hold at least one public meeting and one public hearing for input on the AFH. At least one public meeting will be held during AFH formulation and preparation. A Mayor and Council public hearing and County Board of Supervisors hearing will be held once the draft AFH has been completed. The Consortium may utilize alternative public involvement techniques, such as the use of the Internet.

Public Comment Period

On or before April 1 of any given year, the Consortium will make available the draft AFH for a 30-day comment period. The Consortium will provide a limited number of free printed copies for those who request it.

PUBLIC NOTICES

Public notices will be provided for each public meeting/hearing a minimum of **7 (seven)** days prior to the public meeting/hearing. Notices will indicate the date, time and location of scheduled meetings and reference the topics that will be considered.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

Public notice will be published in a local newspaper of general circulation, posted on the consortium member's websites, and provided to program partners, including the City Metropolitan Housing Commission, and the Tucson-Pima Collaboration to End Homelessness. Pima County may mail notices directly to county residents when feasible.

Public notices will be provided for each public comment period prior to the first day of the public comment period and may be combined with public notice for a public meeting/hearing. Public notice for multiple documents may be combined in years where public comment periods are the same.

Public notices regarding draft documents available for public comment will include a summary of the draft 5-Year Consolidated Plan, draft AFH, draft Annual Action Plan, or draft CAPER, as applicable, and the physical location and website where citizens may review copies of draft plans, and a mailing address, email address, and fax number for submittal of comments.

PUBLIC ACCESS TO INFORMATION

The Consortium will provide citizens, public agencies and other interested parties with reasonable and timely access to public records relating to their past use of HUD funds and related assistance for the previous five years. The 5-year Consolidated Plan, AFH, Annual Action Plan and CAPER will be posted on the City and County websites.

ACCOMMODATIONS FOR NON-ENGLISH SPEAKING PERSONS AND/OR PERSONS WITH DISABILITIES

To encourage participation by non-English speaking persons, where applicable, a bilingual Spanish/English staff person will be present at public meetings/hearings to meet the needs of Spanish speaking persons. For complete information, please refer to the Housing and Community Development Limited English Proficiency Language Assistance Plan (<https://www.tucsonaz.gov/files/hcd/LEP2015.pdf>).

Specific determinations on accommodations to encourage participation by persons with disabilities will be made by Consortium staff on a case by case basis.

COMMENT AND COMPLAINT PROCEDURES

Comments

Any citizen, organization, or group desiring to make a comment regarding the 5-year Consolidated Plan, the Annual Action Plan, the Comprehensive Annual Performance Evaluation Report (CAPER), or the Assessment of Fair Housing may do so in writing, or by email to the Consortium during the public comment period, or in writing or verbally during the public meetings/hearings. The Consortium will respond to written and email comments within 15 working days of receiving the comment where practicable. Responses will be provided in the same manner in which they were submitted. All Consortium responses will be posted to the City and County websites. The response will include a description of any action that will be taken as a result of citizen comments. Comments received during the public comment period will be made a part of the public record and provided to Mayor and Council and/or the County Board of Supervisors. A summary of the comments and responses will be attached to the final

5-Year Consolidated Plan, Annual Action Plan, CAPER, or AFH submitted to HUD. Citizens may also submit comments directly to HUD, though these comments, unless also submitted to the Consortium, cannot be made a part of the public record.

Complaints

Throughout the year, the Consortium will provide a substantive response to every written citizen complaint related to the 5-Year Consolidated Plan, amendments, Annual Action Plan, or CAPER within 15 working days of receiving the complaint where practicable.

CRITERIA AND PROCESS FOR SUBSTANTIAL AMENDMENTS TO THE 5-YEAR CONSOLIDATED PLAN OR ANNUAL ACTION PLAN

Substantial Amendment Criteria

1. A change in the method of distribution (application process, selection criteria) of Consolidated Plan funds that will alter the distribution of funds by at least 20% of the Consortium member’s current year allocation.
2. The addition or elimination of a high priority goal originally described in the 5-year Consolidated Plan.
3. A change in the allocation of funds to a project that exceeds fifteen percent (15%) of the Consortium member’s current-year CDBG or HOME allocation, including program income.
4. The elimination of a project originally described in the Annual Action Plan, except a project that is cancelled and did not draw down any funds.
5. The addition of a project not originally described in an Annual Action Plan.
6. Movement of funds from one project to another in an amount greater than fifteen percent (15%) of the annual CDBG or HOME allocation, including program income.
7. Addition of new programs that must be included in the Consolidated Plan.

A change in the HUD annual allocation of funds received after submission of an Annual Action Plan will not be considered a substantial amendment.

All other changes to the method of distribution or investment strategy that do not meet the substantial amendment criteria will be considered minor amendments and not subject to notification, public hearing and public comment period requirements; minor amendments will be incorporated into the CAPER for review during the public comment period and submitted to HUD annually.

Substantial Amendment Process

1. Public notice of the proposed amendment will be published in a local newspaper of general circulation and posted on the City of Tucson and/or Pima County website. Amendments to the Pima County Annual Action Plan or CAPER will include notification of local governments. The notice will include a summary of the proposed amendment, a request for public comments, the start and end dates of a 30-day public comment period, the physical location and website where citizens may review copies of draft plans, and a mailing address and email address to submit comments.
2. The amendment(s), public comments received, and the response(s) of the Consortium will be provided to the Mayor and City Council and/or Board of Supervisors for review and approval at a public hearing following the 30-day public comment period.
3. The Consortium will notify HUD of any amendments executed, public comments received, and the response(s) of the Consortium.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

CRITERIA AND PROCESS FOR SUBSTANTIAL AMENDMENTS TO THE ASSESSMENT OF FAIR HOUSING

The AFH, if applicable, will be revised in the event of a significant material change in circumstances that calls the AFH into continued validity. Significant material changes include:

- Significant demographic changes related to zoning, or to housing or community development plans or policies.
- The City or County are subject to significant civil rights findings, determinations, Voluntary Compliance Agreements, or other settlements.

Revisions to the AFH will provide at least 30 days for public comment. All comments received will be handled pursuant to this Citizen Participation Plan.

1. Public notice of the proposed amendment will be published in a local newspaper of general circulation and posted on the City of Tucson and Pima County websites. The notice will include a summary of the proposed amendment, a request for public comments, the start and end dates of a 30-day public comment period, the physical location and website where citizens may review copies of draft plans, and a mailing address and email address to submit comments.

2. The amendment(s), public comments received, and the response(s) of the Consortium will be provided to the Mayor and City Council and Board of Supervisors for review and approval at a public hearing following the 30-day public comment period.
3. The Consortium will notify HUD of any amendments executed, public comments received, and the response(s) of the Consortium.

TECHNICAL ASSISTANCE

The City and County will provide technical assistance to any persons or groups interested in commenting on the Consolidated Plan, AFH, Annual Action Plans, or CAPERs. The City and County will also provide technical assistance to very-low and low-income persons and groups representative of very-low and low-income persons in developing proposals for funding under the programs covered by the Consolidated Plan.

ADOPTION OF THE CITIZEN PARTICIPATION PLAN

Prior to adoption of the Citizen Participation Plan, the Consortium will provide notice that the draft Citizen Participation Plan is available for review and comment. The notice will be published in a local newspaper of general circulation, posted on the City and County websites, and provided to program partners. The Citizen Participation Plan and any amendments will be adopted by the Tucson City Council and Pima County Board of Supervisors with the scheduled adoption of the 5-year Consolidated Plan in May of any given year.

In accordance with HUD guidance issued on April 9, 2020, the Consortium members may follow expedited procedures to draft, propose or amend the Citizen Participation Plan, Consolidated Plan and/or Annual Action Plan to provide for not less than five days public notice and opportunity to comment. In-person public hearings will not be required.

ANTI-DISPLACEMENT PLAN

The Consortium will take all reasonable steps to minimize the displacement of persons assisted through the use of HUD CPD funds. Persons temporarily displaced through the use of HUD CPD funds may receive optional relocation assistance. Optional relocation assistance may be provided when conditions in a structure pose an immediate hazard to the health and/or welfare of the occupant(s) of a structure or adjoining structure. Optional relocation assistance may be provided to displaced persons when completion of the work associated with the temporary displacement will require more than one day and not exceed 16 days. The Consortium will secure decent, safe, and sanitary temporary housing, using CDBG funds, in motel rooms or rental properties. Relocation assistance, including room, meals, and transportation, to be paid by the Consortium, are estimated to range from \$100 to \$125 per

day. Costs recovered by insurance or court order will be treated as program income. Implementation of optional relocation assistance will be a matter of last resort when all other available resources in the community have been exhausted.

CONTACT INFORMATION

Comments may be made or information and materials requested by contacting:

The City of Tucson

Housing and Community Development Department Planning and Community Development Division

Physical Address: 310 N. Commerce Park Loop, Tucson, AZ 85745

Mailing Address: P.O. Box 27210, Tucson, AZ 85726-7210

Email Address: HCDAdmin@tucsonaz.gov

Phone Number: 520-791-4171

Fax Number: 520-791-5407

Website: <https://www.tucsonaz.gov/hcd>

Pima County

Community Development and Neighborhood Conservation

Physical Address: 2797 E Ajo Way, Tucson, AZ 85713

Phone Number: 520-724-3777

Fax Number: 529-724-6796

Website: <https://www.pima.gov/cms/One.aspx?portalId=169&pageId=18389>