

CITY OF TUCSON CITIZEN PARTICIPATION PLAN/ANTI-DISPLACEMENT PLAN

Applicability

This document has been prepared concerning the citizen participation planning regulations applicable under Consolidated Plan submittal requirements noted under 24CFR 91.105. This citizen participation plan applies to the City of Tucson and Pima County, which are submitting a Consolidated Plan covering FY 2010 – 2014.

Consolidated Plan Summary

HUD regulations noted in 24CFR 91.105 require the preparation of a Consolidated Plan for the City of Tucson and Pima County HOME Consortium, hereinafter referred to as the Consortium. The Consolidated Plan is a document that will be prepared in draft form by May of a given year and which includes needs, priorities, and long and short-term strategies concerning affordable housing, homeless/special needs, priorities and community development issues in the region. This Consolidated Plan also serves as a long and short-term investment guide for federal Community Development Block Grant (CDBG), Emergency Shelter Grants (ESG), HOME and housing Opportunities for Persons with Aids (HOPWA) resources in the region from FY 2010 - 2014.

Provisions of the Citizen Participation Plan

I and II. Encouragement of Citizen Participation and information to be Provided—In order to encourage citizen participation, the following efforts shall be undertaken by the Consortium.

- 1) Consult with the Metropolitan Housing Commission, the Housing Rehabilitation Collaborative, and the Tucson Planning Council for the Homeless. As needed and applicable, the Consortium will also consult with low-income residents of targeted revitalization areas in which federal projects are anticipated. The Consolidated Plan will be made available to local housing authorities on a continuing basis for the purpose of making it available for and public hearings to be held under HUD Capital Grant Program or Public Housing Agency Plan established pursuant to 24CFR Part 903.
- 2) The Consortium shall hold at least two public hearings concerning the Consolidated Plan. The first meeting shall be held during Consolidated Plan formulation and preparation, while the second shall be held once the draft Consolidated Plan has been completed. One or both of the public meetings shall include the following items:
 - The amount of CDBG, ESG, HOPWA and HOME resources anticipated to be made available on a fiscal year basis, and the eligible range of activities that may be undertaken concerning such federal programs
 - The Amount of CDBG, ESG, HOPWA and HOME resources anticipated to benefit very low-and low-income persons on a fiscal year basis.

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- Plans to minimize the displacement of persons from the intended uses of CDBG, ESG, HOPWA, and HOME resources anticipated to be invested during any given fiscal year.
 - Perspectives in priorities and housing and community development needs.
 - Other aspects of the Consolidated Plan as applicable.
- 3) On or before May 1 of any given year the Consortium will make available their draft Consolidated Plan and the previous years Comprehensive Annual Performance Evaluation Report (CAPER) on the City and County websites for a 30 –day public comment period. The public shall be noticed of this fact in the local news paper and will be apprised of the location where citizens may review copies or draft Consolidated Plans and relevant Comprehensive Annual Performance Evaluation Reports (CAPER).
- 4) On or before mid September of any given year, the Consortium will make available their draft Comprehensive Annual Performance Evaluation Reports (CAPERS) for the previous fiscal year on the City’s website for the mandatory 15- day public comment period.
- III. Access to Records—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 HOME, ESG, CDBG and HOPWA and related assistance for the previous five years. This information shall be made available to interested parties as requested and noticed as such.
- IV. Technical Assistance-- The Consortium will provide assistance to very low- and low-income persons and groups representative of them and that request such in developing proposals for funding under the CDBG, ESG, HOPWA, or HOME resources stated in their Consolidated Plans. Such assistance will be provided to interested parties as requested and noticed as available
- V. Public Hearings— Public hearings to be conducted by the Consortium shall be held at times determined by them. All public hearings shall be noticed with a minimum one week lead time before the actual meetings are conducted and be noticed in the local newspaper. All postings shall include relevant information to permit informed citizen comment.

Where applicable, a bilingual Spanish/ English) staff person shall be present at public hearings to meet the needs of non-English speaking residents where a significant number of non- English speaking residents can be reasonably expected to participate. All public hearings to be conducted will be held at times and locations convenient to prospective program beneficiaries, and be conducted with accommodations for persons with disabilities as requested in advance by at least three days. Specific determinations on the issues noted above shall be made by Consortium staff on a case-by-case basis.

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- VI. Comments and Complaints—Any citizen, organization or group desiring to make a complaint may do so in writing or verbally during the public hearings. Any citizen organizations or groups may also make their views and/or complaints known verbally or in writing to the City and or/County. At all times citizens have the right to submit complaints directly to the Department of Housing and Urban Development as well. The Consortium shall respond to citizen complaints, grievances, or comments, in writing within 15 working days. The response will include a description of any action that will be taken as a result of citizen comments.
- VII. Adoption of Citizen Participation Plan-- Prior to the adoption of the citizen participation plan, it will be noticed as available in the local newspaper, stating that the Plan is available for public review and comment. The Citizen Participation plan is anticipated to be adopted by the Pima County Board of Supervisors and the Tucson City Council with the scheduled adoption of each jurisdiction's Consolidated Plan, anticipated to occur in May of any given year.
- VIII. Comments Received at Public Hearings—Prior to transmitting and Consolidated Plan, substantial amendment, Performance Report or other activity mandating a public hearing, the Consortium shall convey any comments or views of citizens received in writing or orally at public hearings. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to final submissions conveyed to HUD.
- IX. Criteria and Process for Amendments to Consolidated Plan—Should the Consortium cause one of the following items to occur; it would be construed as an amendment to their Consolidated Plan.
- 1) To make a substantial change in the allocation priorities or methods of distribution delineated in the plans. "Substantial" in this context is defined as:
 - a) Changes in any method of distribution for HOME, ESG, OR HOPWA resources that will alter the manner in which funds are allocated to individual projects or entities identified in the Annual Plan by at least 20% of any annual allocation subject to other program requirements in the CFR as applicable.
 - b) Changes that are made to funding priorities in the Consolidated Plan (including prospective changes to McKinney programs and distribution methods) over time when not undertaken through annual submission requirements stipulated by HUD.
 - c) Project deletions or changes made in allocation priorities or methods of distribution that have the effect of changing the funding level or individual CDBG projects identified in its Annual Plan by more than 10% of the annual funding level, subject to other program requirements in 24CFR Part 903 as applicable. Any new project funded with CDBG resources must be noticed to the public prior to funding, as well as significant changes in the use of CDBG funds from one eligible activity to another.

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- 2) To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the action plan;
- 3) To substantially change the purpose scope, location, or beneficiaries of an activity. Changes that are made to projects to be funded in the Consolidated Plan over time when not undertaken through annual submission requirements stipulated by HUD;
- 4) Significant changes in the use of CDBG funds from one eligible activity to another.

Should "substantial" amendments be made to any aspect of the Consolidated Plan after it's formal adoption the Consortium will undertake the following (refer to 91.195(b)(2)(iv) and (b)(6)).

- 1) Inform local Governments
- 2) Provide reasonable notice of the proposed amendment/s in the local newspaper to enable review and comment by the public for at least 30 days. Conduct a public hearing on the subject of the proposed amendment during the 30-day comment period, consistent with Sections III and VI noted herein.
- 3) Submit the amendment/s to the responsible Governing Board/s for approval.
- 4) Upon termination or the 30-day comment period, periodically notify HUD of any amendments executed, citizen comments received and the response/s by the Consortium.

X. City County HOME Consortium Displacement Plan

The Consortium will minimize the displacement of persons assisted through the use of CDBG, HOME, ESG, or HOPWA resources. The policies to be followed are enclosed as an attachment to this document. For the efforts other than acquisition or rehabilitation, the Consortium may utilize adopted local policies concerning displacement assistance.