

Pinal County Citizen Participation Plan

July 2022 Draft

Introduction

The Pinal County Citizen Participation Plan describes policies and procedures for public involvement in Pinal County's Consolidated Plan and Affirmatively Furthering Fair Housing (AFH) planning processes. The Consolidated Plan is a document required by the U.S. Department of Housing and Urban Development (HUD) to receive funding from the HUD Community Development and Planning Office (CPD), including:

1. Community Development Block Grant (CDBG);
2. HOME Investment Partnerships Program (HOME);
3. Emergency Solutions Grant (ESG); and
4. Other programs that may be defined by HUD as part of the Consolidated Plan.

The Consolidated Plan examines the housing and community development needs of Pinal County, and sets 5-year priorities for HUD CPD programs. The AFH is included as an element of the Consolidated Plan and assesses fair housing issues, identifies and prioritizes factors that contribute to fair housing issues, and sets fair housing goals. As part of the Consolidated Plan, each year an Annual Action Plan (AAP) is prepared that describes how HUD-CPD programs will be used to address priorities in the coming year, and how fair housing goals will be addressed. A Consolidated Annual Performance Evaluation Report (CAPER) is also prepared each year and describes the County's performance in meeting its annual goals.

This Citizen Participation Plan may be obtained in alternative languages, upon request. Este plan se puede obtener en diferentes language, a pedido.

In accordance with the requirement of Title II of the Americans with Disabilities Act (ADA), the Pinal County Board of Supervisors does not discriminate against qualified individuals with disabilities admission to public meetings. If you need accommodation for a meeting, please contact the Clerk of the Board Office at (520) 866-6068, at least (3) three business days prior to the meeting (not including weekends or holidays) so that your request may be accommodated. When non-English speaking residents are expected to attend a public hearing or meeting, the county will provide a Spanish interpreter. If other non-English speaking residents are expected, the county will seek interpreter services from appropriate service organizations assisting such persons. The county will contract with an outside service provider should the need arise for additional translation services.

Encouragement of Citizen Participation

The County recognizes the importance of public participation in both defining and understanding current housing, community development, fair housing needs, and prioritizing resources to address those needs. The county's Citizen Participation Plan (CPP) sets forth policies and procedures designed to provide residents of all ages, genders, economic levels, races, ethnicities, and special needs equal access to become involved in the Consolidated Plan, Annual Action Plan, CAPER, and any substantial amendments to the Consolidated Plan or Annual Action Plan. In particular, the county will take appropriate actions to encourage the participation of:

1. Low- and moderate-income persons, as measured by the county's AMI, particularly those living in areas designated as a revitalization area or in a slum or blighted area and in areas where federal funds and proposed to be used;

**Pinal County Citizen Participation Plan
July 2022 Draft**

2. Residents of predominantly low- and moderate-income neighborhoods;
3. Minorities;
4. People with Limited English Proficiency;
5. People with disabilities;
6. People who are experiencing homelessness;
7. Residents of public and other assisted housing developments, including any resident advisory boards, resident councils, and resident management corporations; and
8. Local and regional institutions, the regional Continuum of Care (COC) coalition, and other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, broadband providers, and disaster and emergency management agencies.

Public Meetings/Hearings

The county will conduct at least six public meetings/hearings during the Consolidated Planning process to obtain citizens' views and respond to proposals and questions. The meetings/hearings will be conducted at a minimum of two different stages of the program year. At least five of the public meetings will be held before the draft Consolidated Plan is published for comment.

Public meetings/hearings will be held at times and accessible locations that are convenient to potential and actual beneficiaries. At least one meeting will be held in each of the five supervisorial districts of the county. In widely-dispersed districts of the county, multiple public meetings may be conducted.

The public meetings/hearings together will address:

1. The amount of assistance the county expects to receive (including grant funds and program income);
2. The range of activities that may be undertaken;
3. The estimated amount of funding that will benefit low-and-moderate income persons;
4. The county's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the local government will make available (or require others to make available) to persons displaced, even if the county expects no displacement to occur.

Community Surveys

As part of the planning process, the county may solicit the opinions of the public and community partners supporting the housing and development needs of the community through at least two survey instruments, which will be available in English and Spanish.

Public Comment Periods

Prior to the adoption of a Consolidated Plan (including the AFH), Annual Action Plan, CAPER or any substantial amendments to the Consolidated Plan or Annual Action Plan, the county will make the draft documents available for a comment period. Unless otherwise directed by HUD,

Pinal County Citizen Participation Plan July 2022 Draft

the county will make the Consolidated Plan (including the AFH), Annual Action Plan and any substantial amendment available for review for not less than 30 (thirty) days. The CAPER will be made available for not less than 15 (fifteen) days.

The county will provide a reasonable number of free copies of the Consolidated Plan (including the AFH), Annual Action Plan, CAPER or any substantial amendment to citizens and groups that request them.

Public Comments

Pinal County will consider any comments by individuals or groups received in writing during the public comment periods or orally at public meetings/hearings. A summary of the written and oral comments received during the comment period and at public meetings/hearings will be included in the Consolidated Plan, Annual Action Plan, CAPER or substantial amendment, as applicable.

Public Notices

Opportunities to comment on or participate in planning for community development and affordable housing activities and projects, will be publicized and disseminated as widely as possible. Partner organizations will be asked to encourage participation of the populations whom they serve.

Each public meeting/hearing will be noticed at least 14 (fourteen) days prior to the hearing/meeting date. Notices will include the date, time, and location of the hearing/meeting, as well as a summary of the matter that will be discussed. A contact name and telephone number will be provided to allow interested parties to ask questions or make requests for special accommodations, including accommodations for persons with disabilities and non-English speakers.

Each public comment period will be noticed at least 14 (fourteen) days prior to the start of the public comment period. Notice of public comment period may be combined with notice of public meetings/hearings.

Notices will, at a minimum be published in newspapers of general circulation in Pinal County, including but not limited to Copper Basin News, Superior Sun News, San Manuel Miner, and Casa Grande Valley Newspapers.

Additionally, residents will be informed through email distribution lists, posting on the county's website (<https://www.pinalcountyz.gov/Pages/Home.aspx>), the Pinal County Housing Authority, Pinal County Libraries, notification through partner provider organizations, at (<https://www.pinalcountyz.gov/Grants/Pages/home.aspx>) and Pinal County outlets including the front page of pinal.gov, social media, and newsletters.

Consolidated Plan and Annual Action Plan Amendments

It may be necessary for the county to amend the Consolidated Plan or Annual Action Plan to allow for new or revised projects or activities or for other program administrative actions. Some amendments will be considered substantial, while others will be considered administrative. When a substantial amendment is required, this public participation plan will be followed. Pinal County defines a substantial amendment to the Consolidated Plan or Annual Action Plan as:

1. An increase in funds allocated to a project or activity of \$50,000 or more over the

Pinal County Citizen Participation Plan July 2022 Draft

planned funding amount;

2. A project or activity, using funds from any program covered by the Consolidated Plan, including program income, reimbursements, repayment, recaptures, or reallocations from HUD, not previously described in the Annual Action Plan;
3. The addition of a funding source not previously described in the Annual Action Plan;
4. A change in allocation priorities;
5. A change in the method of distributing funds;
6. A change in the location of a project; and
7. A change in the use of funds from one eligible activity to another greater than 20% of an annual program allocation.

All other amendments, including a change in the federal funding level after publication of a plan, are defined as administrative amendments. Administrative amendments will be incorporated into the Consolidated Plan or Annual Action Plan and do not require public consultation.

Citizen Participation Plan Amendments

It may be necessary for the county to amend this Citizen Participation Plan. Pinal County defines a substantial amendment to the Citizen Participation Plan as a change:

1. In the definition of a substantial amendment; or
2. The publication date of public notices.

All other changes will be considered administrative amendments and will be noted in the program files. Administrative amendments may include but are not limited to: the modes and means of outreach, changes allowed through HUD waivers, and amendments to the Citizen Participation Plan regulations in 24 CFR Part 91.105 that do not significantly revise public participation policies or procedures.

Access to Records

The county will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records related to the Consolidated Plan (including the AFH), Annual Action Plan, CAPER and any amendments upon request. Documents are maintained for not less than five years.

Technical Assistance

The Finance Grants Department will provide technical assistance to any persons or groups interested in commenting on the Consolidated Plan (including the AFH), Annual Action Plan, or CAPER. Additionally, technical assistance will be available to groups representative of persons of low- and moderate-income that request help in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan.

Complaints

The Finance Grants Department will provide a timely, substantive written response to every written citizen complaint related to the Consolidated Plan (including the AFH), Substantial Amendments, Action Plan, and CAPER, where practicable, within 15 working days of receipt. A

**Pinal County Citizen Participation Plan
July 2022 Draft**

summary of any written complaints received during the comment period will be included in the Consolidated Plan, Substantial Amendments, Action Plan, or CAPER as applicable. To file a complaint please visit our website at <https://www.pinalcountyz.gov/Grants/Pages/HUDPrograms.aspx>.

Public Review of the Citizen Participation Plan

This Citizen Participation Plan was made available for public review and comment prior to adoption, in accordance with the Consolidated Plan public notice, public hearing/meeting, and public comment procedures described in this plan.

This Citizen Participation Plan will be available on the county's website. Copies will also be made available to those who do not have internet access at no charge and will be made available in a format accessible to persons with disabilities upon request at (520) 866-6422. Interested citizens may request a copy of the Citizen Participation Plan by emailing grants@pinal.gov.

The county will provide Consolidated Plan information to the Housing department about the Consolidated Plan activities related to its developments and surrounding communities so the Housing department can make this information available at the annual public hearing(s) required for the Public Housing Authority (PHA) Plan.

Contact Information

To comment on this Citizen Participation Plan and any related documents or programs or request additional information, please contact:

Pinal County Finance Department Grants
31 N Pinal Street
Building A, 2nd Floor
Florence, AZ 85132
Phone: 520-866-6422
Website: <https://www.pinalcountyz.gov/Grants/Pages/home.aspx>

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Amended 2022

**Pinal County Citizen Participation Plan
July 2022 Draft**

Anti-Displacement Policy

Pinal County (the county) will take all reasonable steps to minimize the displacement of persons assisted through the use of HUD CPD funds. The county will:

- Avoid or minimize permanent displacement whenever possible and only take such action when no other viable alternative exists.
- Consider the impact on people and properties when funding activities and projects.

When displacement is unavoidable, the county will follow the Guide form Residential Anti-displacement and Relocation Assistance Plan under Section 104(d) of the Housing and Community Development Act of 1974, as amended.

Temporary Displacement of Homeowners

Some owner-occupied housing rehabilitation activities may involve temporary displacement due to lead-based paint abatement, or rehabilitation that exposes the homeowner to health and safety threats. When temporary displacement that 1) exceeds one night, including periodic single nights and 2) requires the removal of and storage of all household furniture cannot be avoided, the county will provide, on a case-by-case basis:

- Temporary living accommodations while the unit is uninhabitable.
- Reimbursement of all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including moving costs, temporary storage of household goods and effects during the time the unit is uninhabitable, and reasonable lodging costs. In no case may payment of moving expenses exceed the Fixed Residential Moving Cost Schedule published by the U.S. Department of Transportation Federal Highway Administration at https://www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.

The temporarily displaced homeowner will be responsible for the physical move. Moving and storage assistance will be limited to the direct costs of packing, crating, storing and insurance to move the homeowner out of and back into the unit upon completion of the work necessitating the temporary relocation.

Temporary Displacement of Tenants

Some activities may involve temporary displacement, such as substantial rehabilitation, lead-based paint abatement or other rehabilitation that exposes the tenant to health and safety threats. When temporary displacement cannot be avoided, the county will provide, on a case-by-case basis:

- Temporary living accommodations while the unit is uninhabitable.
- Reimbursement of all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including moving costs, temporary storage of household goods and effects during the time the unit is uninhabitable, and any increased rent and utilities. In no case may payment of moving expenses exceed the Fixed Residential Moving Cost Schedule published by the U.S. Department of Transportation Federal Highway

Pinal County Citizen Participation Plan July 2022 Draft

Administration at

https://www.fhwa.dot.gov/real_estate/uniform_act/relocation/moving_cost_schedule.cfm.

The temporarily displaced tenant will be responsible for the physical move. Moving and storage assistance will be limited to the direct costs of packing, crating, storing and insurance to move the tenant out of and back into the unit upon completion of the work necessitating the temporary relocation.

Temporarily-relocated tenants that are evicted for cause from a temporary unit are not entitled to continued temporary housing assistance, may lose their right to return to the displacement site, and may not be eligible for relocation payments as a displaced tenant. Tenants displaced for more than one year (365 days) are considered permanently displaced and must be offered permanent relocation assistance.

Permanent Displacement

In the event permanent relocation (displacement) is unavoidable, the county will require a project plan that will:

- Follow current regulations, notices and policies when preparing information statements and notices.
- Provide written notification to eligible property owners or tenants who may be displaced and/or relocated due to an approved project activity.
- Assist those displaced in locating affordable, safe, decent and comparable replacement housing.
- Provide for reasonable benefits to any person permanently displaced as a result of the use of funds.
- Ensure that "just compensation" for acquired property (as determined by appraised fair market value) is paid, when applicable.
- Provide information about equal opportunity and fair housing laws to ensure that the relocation process does not result in different or separate treatment on account of race, color, national origin, religion, sex, disability, familial status or source of income.
- Contingent upon availability, provide other housing assistance to displaced households, such as Section 8 Housing Choice Vouchers, Conventional Public Housing or any other federally funded program for which displaced households may qualify.

Assistance to Aliens

An alien who is not lawfully present in the United States is prohibited from receiving assistance under the Uniform Relocation Act (49 CFR 24.208). When an alien is ineligible and the ineligibility would result in exceptional and extremely unusual hardship to a spouse, parent, or child who is a US Citizen, an exception may be requested from HUD. HUD must make a final determination of eligibility before any assistance is provided.

**Pinal County Citizen Participation Plan
July 2022 Draft**

One-for-one Unit Replacement

The county will replace all low- and moderate-income housing units, whether occupied or vacant, that will be demolished or converted to a use other than as low- and moderate-income housing as part of a project funded with HUD CPD resources. All replacement housing will be provided within three years of the commencement of the demolition or conversion. This includes any property obtained through a public undertaking. Before obligating or expending funds that will directly result in demolition or conversion, the county will make public and submit to the HUD Field Office the following information in writing.

- A description of the proposed assisted activity;
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than for low- and moderate-income dwelling units as a direct result of the assisted activity;
- A time schedule for the commencement and completion of the demolition or conversion;
- The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
- The source of funding and a time schedule for the provision of replacement dwelling units; and
- The basis for concluding that each replacement dwelling unit will remain a low- and moderate-income dwelling unit for at least 10 years from the date of initial occupancy (i.e.: Deed of Trust, Deed Restriction, etc.).

The county will provide relocation assistance to each low- and moderate-income household displaced by the demolition or conversion. Assistance will be provided to relocated and displaced persons according to the calculation of benefits required by the Uniform Property Acquisition and Relocation Act of 1970, as amended.