

## EXHIBIT A

### ❖ CITIZENS PARTICIPATION PLAN

#### **For Pima County's Community Development Block Grant Program:**

Prior to beginning a new program year, the County holds approximately 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.

Pima County holds public meetings in identified CDBG target areas. These meetings are designed to discuss target area needs and eligible uses of CDBG funds relative to the identified needs. In addition, the Pima County Board of Supervisors, the Marana Town Council and the South Tucson City Council hold CDBG public meetings. The County also provides technical assistance workshops for non-profits interested in applying for CDBG funds.

The hearings are advertised through public notices and are published in the non-legal section of the Tucson Citizen and the Arizona Daily Star **and online**. These notices indicate the date, time and location of the scheduled meetings and list the topics to be considered. Notices are also placed in local area publications and mailed directly to county residents when feasible.

Citizens are encouraged to submit their questions, comments and criticisms regarding the county CDBG process or program. These comments may be presented at the public meetings, virtually, through the mail or in person at the Pima County Community Development and Neighborhood Conservation Department. The County provides written responses within 5 working days from the date that the comment is received.

Public input is used to draft a list of projects to be recommended for funding for the upcoming program year. The public may comment on this draft statement, which is reviewed and adopted by the Board of Supervisors, prior to submitting the Annual Action Plan to HUD.

**Access to Records** – Pima County 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, and CDBG and related assistance for the previous five years. This information shall be made available to interested parties as requested.

**Adoption of Citizen Participation Plan** - Prior to the adoption of the Citizen Participation Plan, notices will be placed **on the county website**, in local newspapers, stating that the Plan is available for public review and comment. This 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.

**Comments Received at Public Hearings** – Prior to transmitting any Consolidated Plan, substantial amendment, Performance Report or other activity mandating a public hearing and **or virtual web meeting or teleconference meeting**, the Consortium shall convey any comments or views of citizens received **virtually**, 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.

### **Citizen Participation Reasonable Notice and Opportunity to Comment**

Hud recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of covid-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances. The county constitutes a public meeting as a public hearing that may take place in a physical location, virtual web meeting or teleconference. This authority is in effect through the end of the 2020 program year.

**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 of individual CDBG projects identified in its Annual Plan by more than 10% of the annual funding level, subject to other program requirements in CFR 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.

1. 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;
2. To substantially change the purpose, scope, location, or beneficiaries of an activity. This refers to changes that are made to projects to be funded in the Consolidated Plan when not undertaken through annual submission requirements stipulated by HUD.
3. 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 its formal adoption, the Consortium will undertake the following:**

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 through VI noted herein.
3. Submit the amendment/s to the responsible Governing Board/s for approval.
4. Upon termination of the 30-day comment period, notify HUD of any amendments executed, citizen comments received and the response/s by the Consortium.
5. Availability of waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to prevent the Spread of COVID-19 and mitigate economic impacts caused by COVID-19. This 30-day minimum is for the required public comment period is waived for substantial amendments, provided that no fewer than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipients 2020 program year and us amended throughout the Citizen Participation Plan, a section of the 2014-2019 Consolidated Plan.

❖ **Pima County Displacement Plan**

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