



## Town of Marana, Arizona CITIZEN PARTICIPATION PLAN

Community & Neighborhood Services Department  
Town of Marana  
11555 W Civic Center Drive  
Marana, AZ 85653  
(520) 382-1926

<https://www.maranaaz.gov/community-and-neighborhood-services>

*This document is being provided in a format accessible to persons with disabilities and/or persons with limited English proficiency upon request.*

*The Town of Marana prohibits discrimination on the basis of race, religion, sex, sexual orientation, gender identity, color, ancestry, familial status, serious medical condition, national origin, age or disability, spousal affiliation, in Town employment, Town operated programs, services or facilities.*



## Town of Marana

### Citizen Participation Plan, 2023-2027

The Town of Marana (Town), as an entitlement community, is eligible to receive Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan (Plan) provides for and encourages citizen participation in the CDBG and HOME programs. This Plan is an essential element of the Town's community development process and has been developed to comply with the regulations of the CDBG and HOME programs as administered by HUD.

The Consolidated Plan is a U.S. Department of Housing and Urban Development (HUD) requirement for a Municipality to receive federal housing and community development funding. The Consolidated Plan report examines the housing and community development needs of a municipality, sets priorities for HUD grant monies to which a Town is entitled, identifies the town's performance in meeting its goals, and establishes a strategic plan for meeting current and future needs. Each Consolidated Plan is also required to have a strategy for citizen participation in the Consolidated Planning process.

The Town of Marana is in the process of preparing its Five-Year Consolidated Plan covering the program years 2023 through 2027. This document constitutes the Citizen Participation Plan for the Town of Marana Consolidated Plan. The Citizen Participation Plan (CPP) describes how citizens will participate in four programmatic areas:

1. Development of the Consolidated Plan,
2. Substantial amendments made to the Consolidated Plan,
3. Development of the Annual Action Plan, and
4. Development of the annual performance report (CAPER).

#### **Purpose of Citizen Participation Plan**

The Town of Marana recognizes the importance of public participation in both defining and understanding current housing and community development needs, and prioritizing resources to address those needs. The Town's Citizen Participation Plan is designed to provide citizens of all ages, genders, economic levels, races, ethnicities, and special needs equal access to become involved each year. This document serves as the Town's Citizen Participation Plan for the 2023 Consolidated Plan program year, and all subsequent program years through 2027. This Citizen Participation Plan was drafted in accordance with 24 CFR Sections 91.100 and 91.105 of HUD's Consolidated Plan regulations. In order to ensure maximum participation in the Consolidated Planning process among all populations and needs groups, and in order to ensure that their issues and concerns are adequately addressed, the Town of Marana will follow the standards set forth in its adopted Citizen Participation Plan during development of its Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER), and substantial amendments. The participation process will be developed and monitored by the Town of Marana Community & Neighborhood Services Department. The primary objectives of the Town's Five-Year Citizen Participation Plan are to:

- Encourage citizen participation in the development of the Five-Year Consolidated Plan, the Annual Action Plan, the Consolidated Annual Performance Evaluation Report, and substantial amendments with emphasis on participation from individuals and households identified as low to moderate income, residents of slum and blighted areas, minorities, those with limited English proficiency, the disabled and those residing in areas where funding will be utilized.
- Provide citizens with reasonable and timely access to meetings, information and records relating to the Town's plan for utilizing funding in addition to allowing reasonable opportunity to comment on the Five-Year Consolidated Plan, the Action Plan, the Citizen Participation Plan, the Consolidated Annual Performance and Evaluation Report, and substantial amendments.
- Provide technical assistance to groups representative of persons of low to moderate income and of minority populations that request such assistance in developing proposals for funding. As a condition of providing technical assistance, the Town requires that the activities to be addressed in a proposal be consistent with identified community development and housing needs and funding program guidelines, and that funds be available for such activities as may be involved.
- Provide public hearings to obtain citizen views and to provide the Town's responses to proposals and questions at all stages of the community development program year. Public hearings provide for citizen input on community needs, review of proposed uses of funds, and to assess how funds were spent during previous program year.
- Provide substantive written response to every written citizen comment or complaint within fifteen (15) working days of receiving statement (where practicable).
- Endeavor to meet the needs of non-English speaking and Limited Language Proficiency (LEP) residents in the case of public hearings where a significant number of non-English speaking and/or LEP residents can be reasonably expected to participate. When requested no later than 72 hours prior to a public hearing, appropriate provisions will be determined and made that may include translation of public hearing comments and documents into the language of the majority of the non-English speaking or LEP residents affected. A Spanish translator will be available at community meetings when requested.
- Provide public hearings at locations accessible to persons with disabilities and make provisions for persons with disabilities when requests are made at least 72 hours business days prior to the hearing.
- Provide and allow a method for citizen participation by virtual hearings and/or hybrid virtual and in-person meetings to reduce barriers for participation, such as transportation. If virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

### Citizen Participation Plan Development Process and Adoption

The Consolidated Plan process begins with the preparation of the Citizen Participation Plan (CPP) which describes the Plan Development Process. The CPP informs the public about processes and procedures for public access and influence on the Consolidated Plan and Annual Action Plans, and the proposed scheduling for development and submission of the plan.

Copies of the CPP are made available at least two (2) weeks prior to a public hearing at the Town of Marana Municipal Complex and on the Town of Marana website, at <https://www.maranaaz.gov/community-and-neighborhood-services>. The CPP is also made available during the review of the Consolidated Plan. A virtual public hearing to review the draft Citizen Participation Plan will be held in December 2022. The Citizen Participation Plan will go before Town Council for adoption January 2023.

Prior to the adoption of the Citizen Participation Plan, implementation of the following public comment, review, and adoption procedures ensure that all citizens have a chance to participate in development of the Plan.

- i. The Town will provide a notice of the 15-day public review period for the Citizen Participation Plan in local newspapers and on the Town's website.
- ii. The proposed Citizen Participation Plan will be available for public review at the Town of Marana Community & Neighborhood Services Department, the Town Clerk's office, and on the Town's website.
- iii. Upon request, the Plan will be made accessible to any person with disabilities. The Town will provide a reasonable number of free copies of the Citizen Participation Plan to citizens and groups that request copies.
- iv. Comments or views of citizens received in writing during the public review period will be solicited by the Town of Marana staff. Comments can be sent in writing to the attention of Christine Byler, Community & Neighborhood Services Department, 11555 W Civic Center Drive, Marana, AZ 85653. They can also be made by calling (520) 382-1926 or emailing [cbyler@maranaaz.gov](mailto:cbyler@maranaaz.gov)
- iii. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the final Citizen Participation Plan.

### Amendment of the Citizen Participation Plan

The Town will amend its approved Citizen Participation Plan whenever a change in the public participation process, as outlined in this plan, is proposed. An amendment to the approved Citizen Participation Plan will be reviewed and approved by the Town of Marana Town Council. Notice of any amendment to the Citizen Participation Plan will be published in a newspaper of general circulation no less than 15 days prior to the review and adoption to allow the public the opportunity to review and comment on the amendment. Notice will also be given to key housing and community development organizations in the Town before the 15-day comment period begins. The Citizen Participation Plan will be made available in a format accessible to persons with disabilities upon request. Appeals concerning the amendment should follow the Appeal procedures outlined in this document.

## Glossary of Relevant Terms

**CAPER:** The Consolidated Annual Performance and Evaluation Report, as required by HUD regulations, reports the Town’s completion of projects and activities as outlined within the Action and Consolidated Plans and the expenditure of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds at the end of the program year.

**Consolidated Plan:** A five-year plan of the Town’s Housing and Community Development needs, resources, priorities, and proposed activities to be undertaken for both the CDBG and HOME programs.

**Action Plan:** The yearly portion of the Consolidated Plan that identifies the specific activities and projects to be undertaken with CDBG and HOME during that funding/program year by the Town.

**CDBG:** The Community Development Block Grant Program, as established under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, and the funding received under such program assists communities to address housing and community development needs, primarily for low- and moderate-income residents.

**HOME:** The HOME Investment Partnerships Program, as established by the Cranston-Gonzalez National Affordable Act of 1990, is designed to provide communities with funding from the U.S. Department of Housing and Urban Development for the creation of affordable housing opportunities through partnerships with other organizations.

**Median Family Income (MFI):** HUD surveys major metropolitan areas annually to develop an index of median family income by household size.

**Low- and Moderate-Income Households** - Pursuant to HUD regulations, the primary beneficiaries of the CDBG and HOME programs should be low- and moderate-income households, defined by HUD as follows:

<b><i>Extremely Low-Income</i></b> -	0-30% Marana Metropolitan Statistical Area (MSA) Median family income (MFI) adjusted for household size.
<b><i>Low-Income</i></b> -	31-50% Marana MSA MFI adjusted for household size.
<b><i>Moderate-Income</i></b> -	51-80% Marana MSA MFI adjusted for household size.

**Low- and Moderate-Income Neighborhood** - Generally defined as a census tract(s) or block group(s) in which a minimum of 51 percent of the residents have an income not exceeding 80 percent of the area median family income.

## Relevant Areas and Programs

The Town of Marana 2023–2027 Consolidated Plan covers the geographic area within the Town limits of Marana. The Town is entitled to receive CDBG and HOME funding from HUD during the 2023, 2024, 2025, 2026, and 2027 program years. Each program year coincides with the Town’s fiscal year of July 1st to June 30th.

## Consolidated Plan Development Public Process

The CPP includes efforts to notify governmental and partnering agencies as well as the affected public about the Plan Development Process and to provide ample opportunity for citizen input at all stages.

### Plan Development Schedule

#### PLAN DEVELOPMENT SCHEDULE\*

EVENT	DATE
Issuance of Citizen Participation Plan with Notice of Hearing	December-January
Public Meetings to Solicit Input on Needs and Priorities	January - March
Publication of proposed Consolidated Plan and Action Plan	March - April
Public Hearing on proposed Action Plan & Budget	March - April
Finalization of Consolidated Plan and Action Plan	April
Submit final Proposed Consolidated Plan to the Town Council for Approval	May
Submission of Action Plan application to HUD	May

\*Specific dates and locations are provided in published notices, through direct mailings, in publicly accessible locations and on the Town of Marana website.

### Citizen Involvement

The 2023-2027 Consolidated Planning processes will offer many opportunities for citizen participation. While the Citizen Participation Plan will aim to ensure the participation of all residents, special assurances will be made to ensure the participation of the following groups:

- extremely low-, low-, and moderate-income persons;
- persons living in areas where CDBG and HOME funds are proposed to be used;
- residents of publicly assisted housing;
- low-income residents of target neighborhoods;
- minorities and persons of color;
- non-English speaking persons;
- persons who are homeless; and
- persons with physical disabilities.

Participation will be solicited and encouraged through the following activities.

### Citizen participation hearings

Three public hearings will be held after the publication of the draft Consolidated Plan, with a presentation of the completed Consolidated Plan and Annual Action Plan to the Town Council. Notification of the public hearings will be provided in a newspaper of general circulation and on the Town of Marana website at <https://www.maranaaz.gov/community-and-neighborhood-services>.

### **Community meetings**

Three Consolidated Plan community meetings (also known as public forums or focus groups) will be held to gather public input about the housing and community development needs of citizens and their neighborhoods. The community meetings will also provide an opportunity for citizens and interested parties to obtain information about the Town's housing and community development programs and eligibility requirements. Town staff will be available at the meetings to provide technical assistance for developing funding proposals for the programs covered by the Consolidated Plan.

Two community meetings will be held in early evenings to accommodate work schedules and persons who rely on public transportation and/or are not comfortable driving at night. The locations will be held in low and moderate income areas of the town. At least one community meeting will be virtual to allow persons who do not have access to transportation or other barriers to participant.

Community residents will be informed of the community meetings using many methods, including distribution of flyers, personal contact with agencies and advocates, and media releases. All sites selected for the meetings are accessible to the physically disabled. Auxiliary aids and services available to community residents may be, but are not limited to, a qualified sign language interpreter, large print materials, audio tape, a note taker, open or closed captioning, assistive listening devices, web site access, etc. This request should be made to the Town's Community & Neighborhood Services Outreach Coordinator in writing, or by phone at (520) 382-1926, at least 72 hours prior to the event where that accommodation is needed. A Spanish translator will be available at community meetings when requested.

### **Announcements/invitations**

Multiple processes will be used to inform citizens, local government officials, advocates, housing and community development officials and providers, organizations serving minority residents, homeless residents, special needs residents, and low income residents, and others about the public hearings and community meetings. Citizens will be given advance notice of the public, postings on the Town website, press releases, emails, and formal publications in in a newspaper of general circulation two weeks prior to public hearings.

### **Public Comment**

Prior to the adoption of a Consolidated Plan, the Town will make available to interested parties the Draft Consolidated Plan and Executive Summary for a comment period of no less than 30 days.

The Draft Consolidated Plan will contain the amount of assistance the Town expects to receive through the HUD CDBG and HOME grants and the activities that are planned for the 2023-2027 Consolidated Planning period. The Draft Plan will also include the Town's policies related to displacement of low- and moderate-income individuals, reducing poverty, removal of lead-based paint hazards, preventing and mitigating homelessness and removing barriers to fair housing choice. The entire proposed Consolidated Plan will be available for viewing at the Town of Marana Community & Neighborhood Services offices, located at 11555 W Civic Center Drive, Marana, AZ 85653 during the full public comment period. The proposed Consolidated Plan will

also be available for viewing on the Town's website, <https://www.maranaaz.gov/community-and-neighborhood-services>.

Hard copies of the Executive Summary will be available to the public upon request. Upon request, the Plan will be made accessible to any person with disabilities. Citizens or groups that have attended any of the community meetings or public hearings will be notified by mail or email of the Consolidated Plan's availability for comment. The Town will openly consider any comments of individuals or groups received in writing during the Consolidated Planning process or at public hearings. A summary of the written and public hearing comments will be included in the Final Consolidated Plan, along with the Town's response to the comments.

The Town will provide a substantive written response to all written citizen comments and complaints related to the Consolidated Plan, amendments, and the CAPER within 15 working days of receiving the comments and complaints. Copies of the comments and complaints, along with the Town's response will be sent to HUD if they occur outside of the Consolidated Planning process and, as such, do not appear in the Consolidated Plan.

## **Consolidated Annual Performance and Evaluation Report (CAPER)**

### **Citizen participation**

Hard copies of the Draft CAPER will be located at the, Town Clerk's Office, Community & Neighborhood Services Department Offices, and on the Town's website at <https://www.maranaaz.gov/community-and-neighborhood-services>.

### **Citizen Comments**

Before the Town submits a Consolidated Plan Annual Performance and Evaluation Report (CAPER) to HUD, the Town will make available to interested parties the proposed CAPER for a comment period of no less than 15 days. Citizens will be notified of the CAPER's availability through newspaper notification. The notification will appear in at least one newspaper that is circulated throughout the Town. The notification may be made as part of the Town's notification of the public comment period for the CAPER and will be published two weeks before the CAPER comment period begins.

Each CAPER will be available for review and viewing at the Town of Marana Community & Neighborhood Services Department offices located at 11555 W Civic Center Drive, Marana, AZ 85653 during the full public comment period.

## **Yearly Action Plans to the Consolidated Plan**

Excluding 2023 and any year in which a new Consolidated Plan is adopted by the Town, the yearly Action Plan will be adopted through a Citizen Participation Process in which at least four public hearings are held. The public hearings will be conducted on the following basis:



### **Initial Community Meetings**

There will be two community meetings held at the beginning of the Action Plan process. The community meetings will occur in late fall and/or early winter, generally between November and February each year, and are intended to present the public with an overview of the adopted strategies and priorities of the Consolidated Plan. This will include an overview of allowed activities under the CDBG and HOME programs, as well as an overview of the previous year's Action Plan activities and projects for the Town. The community will also be able to provide their insights on community needs and potential projects. The community meetings will be held at locations throughout the Town, and each will be held in public buildings located in areas that are close to or within the designated low and moderate- income areas of the Town. Additionally, the meetings will be held in buildings that are accessible to all members of the public. The meetings may be hybrid to allow participants to attend the meeting virtually.

### **Final Action Plan Public Hearings**

There will be two public hearings held to gather direct input from the public on the overall proposed activities and programs to be completed as part of that year's Action Plan. The hearings will occur during the 30-day public comment period, generally in late winter or early spring around mid-March to mid-April, prior to consideration of the Action Plan by the Town Council. The hearings will be held at two locations throughout the Town. Additionally, the hearings will be held in buildings that are accessible to all members of the public. Citizens will be given advance notice of the public hearings through notifications in late March, postings on Town agency websites, press releases, emails, and publications in a newspaper of general circulation.

In the event of a national, state or local declared emergency that limits the ability for in person meetings, virtual hearings\* will be an allowed method for citizen participation. If virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.

### **Citizen Comments**

Before the Town submits an Annual Action Plan to HUD, the Town will make available to interested parties the proposed Annual Action Plan for a comment period of no less than 30 days. Citizens will be notified of the Annual Action Plan's availability through newspaper notification. The notification will appear in at least one newspaper of general circulation. The notification may be made as part of the Town's notification of the public comment period for the Annual Action Plan and will be published between two and three weeks before the CAPER comment period begins.

Each Annual Action Plan will be available for review at the Town of Marana Community & Neighborhood Services Department offices, located at 11555 W Civic Center Drive, Marana, AZ 85653 during the full public comment period, and on the Town website, <https://www.maranaaz.gov/community-and-neighborhood-services>.

## Substantial Amendments

Substantial amendments are funding adjustments or reallocations that involve adding, deleting or shifting 20% or more of the approved funds from one eligible activity to another. An eligible activity is defined in 24 CFR Parts 201 through 206. Substantial amendments will be subject to a 30-day comment period following publication of the proposed amendment in a newspaper of general circulation and posting on the Town web site. A summary of comments or views, and a summary of comments and views not accepted and the reasons therefore, will be attached to the substantial amendment.

All other minor changes to activities will be considered informal programmatic amendments and will be so noted in the program file. A copy will be sent to HUD CPD for their information.

The substantially amended sections of the Consolidated Plan or Annual Action Plan will be available for review at the Town of Marana Community & Neighborhood Services office, located at 11555 W Civic Center Drive, Marana, AZ 85653 during the full public comment period. In addition, the substantially amended sections of the Consolidated Plan will be made available on the Town's website, <https://www.maranaaz.gov/community-and-neighborhood-services> for the full duration of the public comment period.

### **Disaster/Emergency events that may require expedited substantial amendments**

It may be necessary to expedite substantial amendments to the Consolidated Plan in the event of a declared national, state or local disaster or emergency. A declared national, state or local disaster or emergency may include but is not limited to (1) Man-Made-disasters, (2) Natural disasters, and (3) Terrorism. Man-made disasters can include chemical spills, mass rioting, power outages, dam failure, plant explosions, etc. Natural disasters can include earthquakes, tsunamis, hurricanes, tornadoes, wild fires, flooding and public health issues such as wide-spread disease such as the recent coronavirus disease 2019 (COVID-19). Terrorism events include bomb threats, biochemical attacks like the spread of anthrax, or cyber-attacks like hacking, phishing, and virus distribution, etc. man-made disaster. The use of expedited substantial amendments is intended to facilitate the use of funds to protect the health and safety of Town of Marana residents or to prevent, prepare for, and respond to a declared national, state or local disaster/emergency

These expedited substantial amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the Town of Marana may utilize CDBG or HOME funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period, which is otherwise required for substantial amendments.

Potential eligible uses of funds are those that are included in this Citizen Participation Plan, the Consolidated Plan, or any other CDBG or HOME eligible use.

HUD may provide new guidance on eligible uses in which the Town will comply with and may utilize as well.

All eligible CDBG activities, including those to address declared disasters or emergencies, must meet one of three national objectives which are:

- (1) Benefit low- and moderate-income (LMI) persons;

- (2) Aid in the prevention of slums or blight; and
- (3) Meet a need having a particular urgency (referred to urgent need).

The Town of Marana may carryout eligible CDBG activities to meet needs resulting from declared disasters or emergencies under any one of the three national objectives.

### **Changes in federal funding level**

Any changes in federal funding level after the Draft Consolidated Plan or Annual Action Plan's comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

### **Consultation with Organizations and Town Agencies**

When preparing the Consolidated Plan, the Town will actively consult with public and private agencies that provide housing, health, homeless and social services in order to ensure that the interests and needs of all groups are being adequately addressed. The Town will also make the Consolidated Plan available to surrounding units of local government and its PHA. This consultation will occur through the community meetings, interviews conducted with such organizations including those that provide services to special needs populations and incorporation of data and reports produced by such organizations into the Consolidated Plan.

### **Public Access to Records**

The Town will provide all interested parties with access to information and records related to the Town's Consolidated Plan, Citizen Participation Plan, Annual Action Plan and CAPER, and the Town's use of assistance under all programs covered by the Consolidated Plan during the preceding five years. The public will be provided with reasonable access to housing assistance records according to the Town of Marana Public Records Requests procedures. Persons who would like access to records should contact the Town Clerk's Office in person, on-line, by mail, e-mail or fax. Reasonable accommodation for persons with disabilities will be made upon request. Documents may also be downloaded from the Town of Marana Community & Neighborhood Services Department website.

### **Complaints and Grievances**

The Town of Marana will provide written responses to written complaints and grievances received regarding any aspect of the annual Consolidated Plan federal entitlement grant program within 15 working days, where practicable, of receiving the complaint or grievance. Comments, complaints, and grievances concerning the Consolidated Plan, Annual Action Plan, or CAPER should be addressed to the Community & Neighborhood Services Director.

## Appendix: Comments Received

Below are the following comments received during the 15-day public comment period.

In reading the draft citizen participation plan, it struck me that there doesn't seem to be any mechanism for ongoing citizen input other than the "public" meetings. I'd suggest an advisory group that meets periodically to recommend/review proposed projects. I believe it would be most useful if the advisory group were comprised of citizens residing in eligible funding areas as well as other town residents who have an interest and/or expertise in improving/expanding housing options throughout the town, resulting in an overall more economically "balanced" community development process.

I think it is great that Town of Marana will be a participating jurisdiction in the Community Development Block Grant (CDBG) Program of the U.S. Department of Housing and Urban Development (HUD). Low-income families need all the help they can get!