



**PIMA COUNTY**

ENVIRONMENTAL QUALITY

# **Civil Rights Program Development**

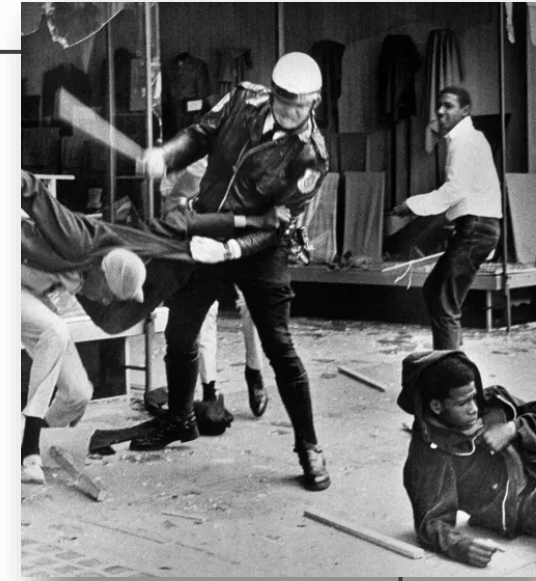
Pima County Department of Environmental Quality (PDEQ)

*Abigail Okrent, PDEQ Rules & Policy Manager*

*Sarah Hite, PDEQ Environmental Specialist*

# Overview

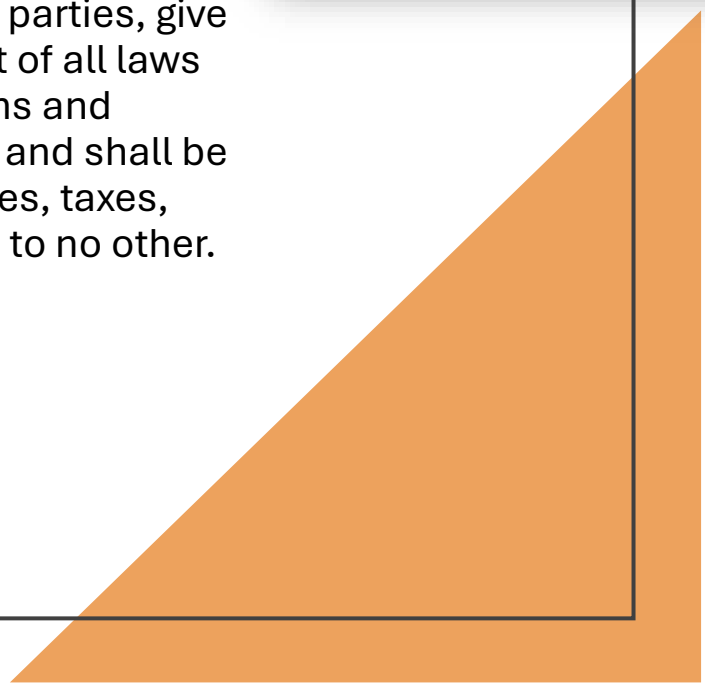
1. What is civil rights law and why does it involve air agencies?
2. What is environmental justice and how does it connect to civil rights?
3. How our humble agency got involved in this.
4. What's next for our agencies in the new administration?



# Civil Rights Law

Civil Rights Act of 1964 (42 U.S.C. Chapter 21) was initially explicitly a response to racial discrimination, passed through movement pressure:

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to [make and enforce contracts](#), to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property ***as is enjoyed by white citizens***, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.



# Civil Rights Law

Currently, federal civil rights law includes prohibitions on discrimination against people on the basis of

- race
- color
- national origin (including limited-English proficiency)
- disability
- sex
- age

States and local governments may include additional protected classes.

# Civil Rights Law

This is enforced through prohibitions on discrimination:

- By federal agencies
- In public accommodations
- To the states through the Interstate Commerce Clause and 14<sup>th</sup> Amendment
- And to recipients of federal funding

# Civil Rights & the EPA

EPA is responsible for monitoring and enforcing:

- *Title VI of the Civil Rights Act of 1964*
- *Section 504 of the Rehabilitation Act of 1973*
- *Title IX of the Education Amendments of 1972*
- *Section 13 of the Federal Water Pollution Control Act Amendments of 1972*
- *Age Discrimination Act of 1975*

...in accordance with EPA's implementing regulations.

40 C.F.R. Part 5 <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-A/part-5>

and

Part 7 <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-A/part-7>

# Civil Rights & the EPA

*“Historically, public participation opportunities did not always succeed in reaching all interested or affected segments of the public, nor did they always provide access to influence EPA’s decision-making or to ensure accountability. In response to these concerns identified by members of the public and other government agencies, EPA emphasizes the term **“meaningful involvement”** to refer to how the public participation process **could include and be accessible to a more representative public**—including **multi-lingual, multi-cultural, rural, and urban populations with differing abilities, ages, and documentation statuses**—all communicated in **plain language.**”*

- [EPA’s Meaningful Involvement Policy document](#), Page 5

# Environmental Justice & Civil Rights



***“Environmental justice” is a social justice movement***

- It too arose as a response to racism, and became a national movement by Black-led organizing, in this case in the 1970’s in NC
- The term “environmental justice” was coined in the 1980’s, although arguably discriminatory practices of resource extraction and pollution concentration have been around for centuries/eons



# Environmental Justice & Civil Rights

1<sup>st</sup> EJ Executive Order signed by President Bill Clinton in 1994, EO 12898

“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”

Several executive orders have been signed since then, and agencies including the EPA have continued to develop their own plans and guidance for environmental justice.

# Environmental Justice & Civil Rights

While civil rights compliance has defined classes, environmental justice allows for broader analyses of who is impacted, who is excluded, who is harmed, and who is engaged in all aspects of environmental projects and actions.

Both areas require a look not just at intent, but at effect.

Both, at their core, require ***meaningful public participation.***

# PDEQ's Civil Rights Resolution

## **Background:**

In June 2024, PDEQ and the EPA signed an “Informal Resolution Agreement” resolving a complaint.

The complaint arose from our permitting process for Becton Dickinson (BD), which proposed to use ethylene oxide for medical device sterilization.

PDEQ engaged in a thorough outreach process and EJ analysis during the BD permitting application; however, this revealed that we did not have standard practices for our civil rights compliance for the department.

# PDEQ's Civil Rights Resolution

**Informal Resolution Agreement (IRA)** signed in June 2024 between PDEQ and EPA Office of Environmental Justice and External Civil Rights (OEJECR).

This Agreement imposed a number of conditions on PDEQ, including the development and adoption of multiple written documents, processes, internal office training, and tracking and reporting.

# PDEQ's Civil Rights Program

## **Development of the Civil Rights Plan**

### Outreach

- Used office and personal organizing networks to reach out to local social justice, environmental activism, disability rights, refugee/immigration agencies, food banks, local governments, and other organizations for ongoing project development
- Ultimately had meetings with disability rights organizations, the regional EJ center at UA, and the head of a refugee agency

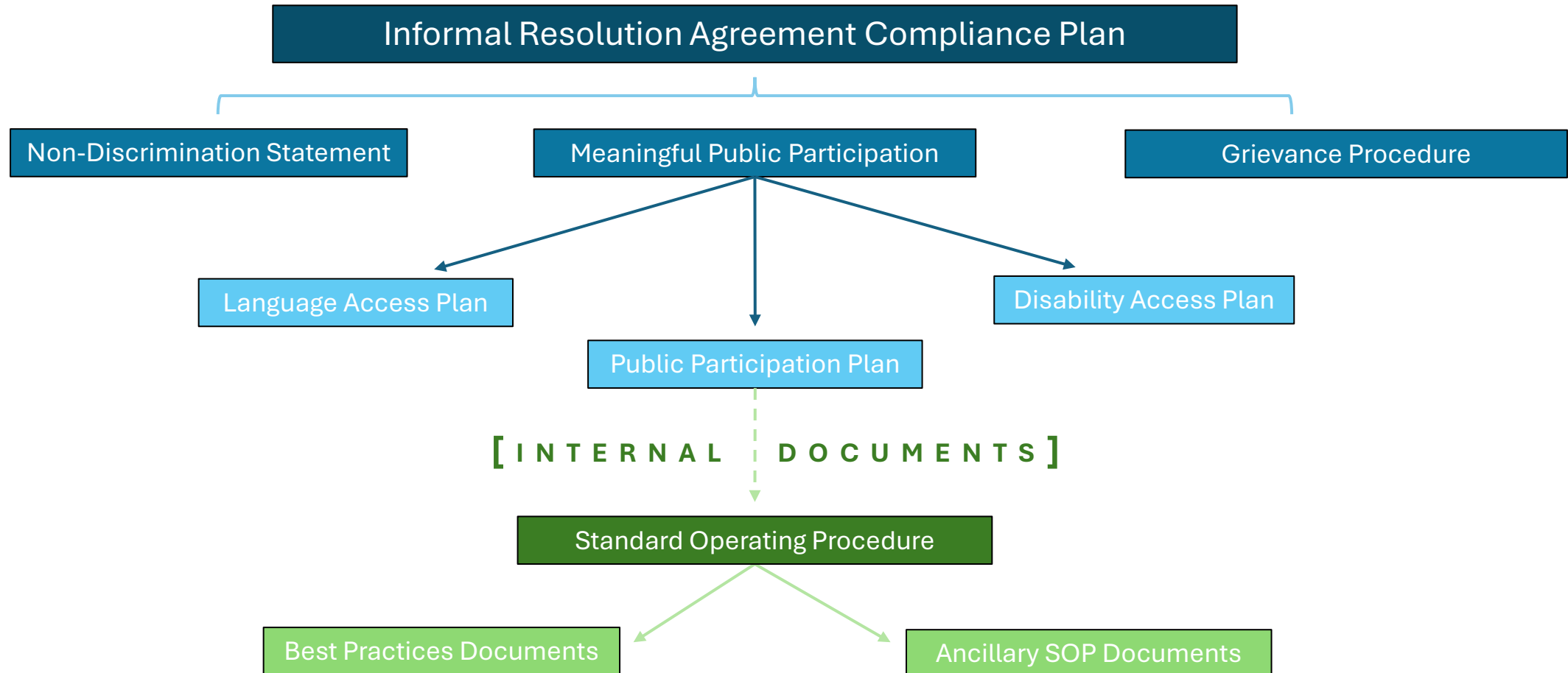
# PDEQ's Civil Rights Program

## Development, Cont'd

### Review of other plans

- Looked to other Pima County plans for compliance; only PCDOT has one
- Looked at other regional, statewide, and beyond environmental and transportation agencies for their plans
- EPA was developing its plan concurrently with our development, so we were not able to rely on that ([“Civil Rights Guidance on Procedural Safeguards”](#))

# PDEQ Civil Rights Program Structure



# PDEQ Notice of Non-Discrimination

The Pima County Department of Environmental Quality is **committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program, activity, or service that it provides.**

PDEQ **does not discriminate on the basis of race, color, sex, national origin (including limited English proficiency), age, or disability**, in full compliance with **Title VI of the Civil Rights Act of 1964 and other applicable acts and laws**. PDEQ **does not intimidate or retaliate** against any individual or group because they have exercised their rights to participate in or oppose actions protected/prohibited by **40 C.F.R. Parts 5 and 7**, or for the purpose of interfering with such rights.

PDEQ's Civil Rights Coordinator will be responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Parts 5 and 7 (Non-Discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Title IX of the Education Amendments of 1972; and Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (hereinafter referred to collectively as the federal non-discrimination laws).



# PDEQ's Civil Rights Program

## ***Public Participation Plan***

- Details the Standard Operating Procedure for how PDEQ implements meaningful engagement into its activities

## ***Disability Access Plan***

- Covers how PDEQ ensures that community members of Pima County can access our engagement activities

## ***Language Access Plan***

- Explains language access challenges in Pima County and how PDEQ addresses and overcomes those challenges

# PDEQ's Civil Rights Program

PDEQ has created a **Standard Operating Procedure (SOP)** to standardize how the department incorporates meaningful involvement into its public engagement processes.

This SOP mainly consists of 3 documents:

- Initial Assessment Tool
- Ongoing Assessment Tool
- Final Assessment Tool

The SOP also involves several additional supporting documents like a **Legal Notice Requirements** chart, a **Best Practices document**, and it also references the **Disability and Language Access Plans**.

### INITIAL ASSESSMENT TOOL

*To be completed and saved every time a project requiring public notice is initiated.*

Name of project: \_\_\_\_\_

Permit #, Code Section(s) # or Rule(s) # if relevant: \_\_\_\_\_

Person completing form: \_\_\_\_\_

Date completed: \_\_\_\_\_

1. What type of action is this?

- Ordinance
- Ordinance with fees
- Action requiring federal approval (i.e. SIP Rulemaking)
- New permit – Title V source
- Permit renewal- Title V source
- New permit – non-Title V
- Permit renewal – non-Title V
- Office policy change
- Other: \_\_\_\_\_

2. Potential impacts of project

- Broad look impacts
  - Air – release of criteria pollutants: \_\_\_\_\_
    - Decrease from current levels
    - Same as current levels
    - Increase above current levels
  - Air – release of hazardous pollutants: \_\_\_\_\_
    - Decrease from current levels
    - Same as current levels
    - Increase above current levels
  - Water
  - Other nuisance (i.e. noise, lights, odor): \_\_\_\_\_
  - Financial impact: \_\_\_\_\_
  - Safety
  - Transportation/Mobility/Access
  - Heat
  - Other: \_\_\_\_\_

- Tailored assessment to be completed (refer to internal Best Practices list “EJ Evaluation Tools and Criteria”):
  - EJ Screen
  - Pima Maps
  - Heat map
  - Other: \_\_\_\_\_

3. Legally required notice (see “Legal Notice Requirements”)

4. Additional steps for all PDEQ actions requiring notice (see “Standard Additional Notice”)

5. Needs/corrective actions not met in Step 3 and 4, based on Step 2 evaluation

- Language Access Plan –
- Disability Access Plan
- Other (create Best Practices doc)
  - Literacy/reading level
  - Technology/news access
  - Other

6. Additional stakeholder input sought? \_\_\_\_\_

**ONGOING ASSESSMENT TOOL**

To be completed as many times as necessary, if new information or concerns arise during a public notice process.

Name of project: \_\_\_\_\_

Permit #, Code Section(s) # or Rule(s) # if relevant:  
\_\_\_\_\_

Person completing form: \_\_\_\_\_

Date completed: \_\_\_\_\_

1. Nature of new information and concerns:

Brief summary:

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How was this information obtained (ie public comment, stakeholder information, other?):

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2. Potential impacts of project – are there any new potential impacts not indicated in the Initial Assessment Tool?

- Broad look impacts
  - Air – release of criteria pollutants: \_\_\_\_\_
  - Decrease from current levels

- Same as current levels
- Increase above current levels
- Air – release of hazardous pollutants: \_\_\_\_\_
  - Decrease from current levels
  - Same as current levels
  - Increase above current levels

- Water
- Other nuisance (ie noise, lights, odor): \_\_\_\_\_
- Financial impact: \_\_\_\_\_
- Safety
- Transportation/Mobility/Access
- Heat
- Other: \_\_\_\_\_

○ Tailored assessment to be completed (refer to Best Practices list “EJ Evaluation Tools and Criteria”): Are there any tools not checked in the Initial Assessment Tool that you now feel are important to use?

- EJ Screen
- Pima Maps
- Heat map
- Other: \_\_\_\_\_

3. Needs/corrective actions: Are there any corrective actions not checked in the Initial Assessment Tool that you now feel are important to use?

- Language Access Plan –
- Disability Access Plan
- Other (create Best Practices doc)
  - Literacy/reading level
  - Technology/news access
  - Other

4. Do you anticipate an additional Ongoing Assessment after this one, or will this one likely resolve the known and anticipated issues?

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**FINAL ASSESSMENT TOOL**

To be completed after the public participation process has come to an end and a decision about the action has been made.

Name of project: \_\_\_\_\_

Permit # or Rules # if relevant: \_\_\_\_\_

Person completing form: \_\_\_\_\_

Date completed: \_\_\_\_\_

**1. Minimum required legal notice completed:**

- BoS Vote – *Date completed:* \_\_\_\_\_
- BOSAIR – *Date completed:* \_\_\_\_\_
- Website Posting – *Date completed:* \_\_\_\_\_
- Newspaper Notice – *Date(s) completed:* \_\_\_\_\_
  - o Which newspaper(s)? \_\_\_\_\_
- Mandatory Public Comment Period – *Da* \_\_\_\_\_
- Notified Interested Parties List (Gov Del \_\_\_\_\_
- Notify Local Governments – *Date compl* \_\_\_\_\_
- Published Response to Public Comment \_\_\_\_\_
- Mandatory Public Hearing – *Date compl* \_\_\_\_\_
- Public Hearing (if requested) – *Date com* \_\_\_\_\_
- Published after adoption – *Date complet* \_\_\_\_\_
  - o Location of publication: \_\_\_\_\_

Any additional comments:

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**4. Overall review of the process:**

*What went well? What went poorly? What would you change next time?*

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**2. Additional PDEQ mandatory notice completed (please reference "PDEQ Mandatory Additional Notice" document):**

- Informal notice posted in Spanish on a Spanish language or dedicated bilingual news forum
  - o *Date completed:* \_\_\_\_\_
  - o *Where was this posted?* \_\_\_\_\_

\_\_\_\_\_  
social media sites and PDEQ webpage

\_\_\_\_\_  
*s?*

\_\_\_\_\_  
main Pima County Library (if open) and in a library  
to the physical location impacted by the action if  
Spanish)

\_\_\_\_\_  
*is posted at?:*

\_\_\_\_\_  
part 70 air permit applications and permit renewals  
minors) or any other actions where PDEQ is  
ist in the matter

\_\_\_\_\_  
period from 30 days to 45 days (or longer if desired)  
Spanish on a Spanish language or dedicated

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social media sites and PDEQ webpage

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PDEQ Public Participation Process – Initial Assessment Tool Step 3

NOTICE REQUIREMENTS

ACTION	BoS vote and BoSAIR <i>**If required, Clerk of Board will post notice to BoA lobby**</i>	Website Posting	Newspaper Notice	Mandatory Public Comment Period	Notify Interested Parties	Publish Response to Public Comment	Mandatory Public Hearing (in addition to BoS hearing)	Public hearing (if requested)	Published After Adoption	Additional Requirements and Notes
<p>All county ordinances* (ARS 11-251.05)</p> <p>*Excluding rules adopted under A.R.S. Title 49, Chapter 3, Article 3 (County Air Pollution Control), pursuant to the exception in PCC 2.32.020.A</p>	<p>Yes. <a href="#">ARS 11-251.05</a></p> <p>BoSAIR required per <a href="#">Pima County Admin Pro. 4.1</a>. See details for multiple deadlines.</p> <p>Notice of proposed rulemaking to be filed with Clerk of Board before any rulemaking. <a href="#">PCC 2.32.030</a></p>	<p>Yes, posted by PDEQ. <a href="#">PCC 2.32.030</a> (C)</p>	<p>Notice in <b>ONE</b> newspaper of general circulation in County Seat <u>at least 15 days before BoS Meeting</u> <a href="#">ARS 11-251.05</a></p>	<p>Public comment period will <u>begin</u> the date the notice of proposed action is posted on the county website and will close seven calendar days following the last public meeting  <a href="#">PCC 2.32.030</a></p>		<p>Must evaluate all public comments and must respond in writing to all written comments, may respond to verbal comments, must provide responses to Board and post on website. <a href="#">PCC 2.32.040</a></p>	<p>Not less than 14 calendar days following posting of notice of proposed action on County website, proponent will conduct one or more public meetings to receive public comment. <a href="#">PCC 2.32.030</a> (D)</p>		<p>Yes, <u>no</u> specific deadline. <a href="#">ARS 11-251.05(C)</a></p>	
<p>New or increased tax or fee (ARS 11-251.13)</p>	<p>Yes. <a href="#">ARS 11-251.13</a> and <a href="#">ARS 11-251.05</a></p> <p>BoSAIR required per <a href="#">Pima County Admin Pro. 4.1</a>. See details for multiple deadlines.</p>	<p><u>At least 60 days before</u> BoS approval or disapproval. <a href="#">ARS 11-251.13</a></p>								
<p>Air rule, ordinance, or regulation</p>	<p><u>20 days' notice</u> of this required by <a href="#">ARS 49-479</a></p> <p>Additional citations: <a href="#">ARS 11-251.13</a> and <a href="#">ARS 11-251.05</a></p> <p>BoSAIR required per <a href="#">Pima County Admin Pro. 4.1</a>. See details for multiple deadlines.</p>	<p>Yes. <a href="#">ARS 49-471.04</a></p> <p>And if more stringent because "peculiar local conditions" apply then also through <a href="#">ARS 49-112(D)(1)</a> (although this is already covered under 471.04)</p>	<p>Notice in <b>ONE</b> newspaper of general circulation with <u>at least 30 days comment period</u> <a href="#">ARS 49-112(D)(1) and (2)</a></p> <p>Notice in <b>ONE</b> newspaper of general circulation <u>at least 2 times</u> <a href="#">ARS 49-498</a> and <a href="#">PCC 17.04.400</a></p>	<p><u>At least 30 days long</u> <a href="#">ARS 49-112(D)</a> and <a href="#">ARS 49-471.06(B)</a></p>	<p>Send notice by mail, fax, or email to any person who has requested notification  <a href="#">ARS 49-471.04</a></p>	<p>Yes, on website. <a href="#">ARS 49-112(D)(3)</a></p>		<p>Notice of this hearing to be posted on website <u>at least 20 days before hearing</u>, and in newspaper. <a href="#">ARS 49-112(D)(4)</a></p> <p>Also with <u>30 days'</u> notice after posting on website. <a href="#">ARS 49-471.06</a></p>	<p><u>Within 30 days after</u> adoption of rule. <a href="#">ARS 49-471.07(G)</a></p>	<p>- Notice of proposed rulemaking demonstrating compliance with <a href="#">ARS 49-112(D)(1)</a>, <a href="#">ARS 49-471.04</a>, <a href="#">ARS 49-471.05</a></p> <p>- <u>Within 120 days</u> after close of record: Complete with info from <a href="#">ARS 49-471.07</a></p> <p>Informal Stakeholder Meeting: <b>Permissive.</b> <a href="#">ARS 49-471.06(A)</a></p>
	Yes. <a href="#">ARS 11-251.05</a>	Yes. <a href="#">ARS 49-471.06(D)</a>		At least 20 days				Yes, as county		Only available to perform directi

## PDEQ Public Participation Process

### Initial Assessment Tool: Step 4

#### Mandatory Additional PDEQ Notice Requirements for All Actions Requiring Public Notice

1. If an action is legally required to have a notice in a physical newspaper (*See Initial Assessment Tool Step 3, and accompanying Legal Notice Requirements Table*), PDEQ will additionally post informal notice:
  - In Spanish on a Spanish language or dedicated bilingual news forum
  - On social media sites and the PDEQ webpage
    - In a manner that is accessible to language translation tools and low-vision/no-vision reader software (*See PDEQ's web team with questions about accessibility*)
  - This notice does not need to meet all formal notice requirements of the Arizona Revised Statutes (ARS) and Pima County Code (PCC), so long as it includes information about the nature of the action, the timeline for public comments and date of any public hearing, and a link to the PDEQ web page where more details can be found.
2. All notices posted anywhere outside PDEQ's websites must have QR [codes](#) or links to the PDEQ website.
3. PDEQ will post informal notice in the main Pima County Library if open, and in the library or other public building closest to the physical location impacted by the action if applicable (in English and in Spanish)
4. PDEQ will hold mandatory public hearings required in Step 3, and will additionally hold public hearings:
  - For all Part 70 air permit applications and permit renewals (Class I and Class II synthetic minors)
  - For all new permit applications releasing HAPS
  - For all other actions where PDEQ is already aware of a public interest in the matter
5. If PDEQ is holding a public hearing, it will extend a mandatory 30-day comment period to 45 days (or longer if desired) to allow for at least 15 additional days after the hearing for submission of written comments.
6. For public hearings, PDEQ will consult Best Practices [x document] to determine whether the hearing should be:
  - In person, virtual, or both
  - During normal business hours, after business hours, or both
  - Please indicate which decision was made and why: \_\_\_\_\_
7. If the action is legally required to be published in a newspaper after adoption, PDEQ will also publish it:
  - In Spanish on a Spanish language or dedicated bilingual news forum
  - On social media sites and the PDEQ webpage
    - In a manner that is accessible to GoogleTranslate and low-vision/no-vision reader software (*See PDEQ's web team with questions about accessibility*)
8. If a virtual stakeholder meeting or public hearing/oral proceeding is required, PDEQ will record and transcribe the event to be provided, by request, to the public.

PDEQ has set up a temporary web page to share the Public Participation Documents and receive feedback. The webpage is fully compatible with accessibility and translation software.

[www.pima.gov/3361](http://www.pima.gov/3361)

• Public Participation Plan

• Disability Access Plan

• Language Access Plan

Home | Departments & Offices | Health & Community Services | Environmental Quality | Civil Rights | Public Participation Process

## PUBLIC PARTICIPATION PROCESS + CONTENT FOR PUBLIC REVIEW

**DRAFT WEBPAGE:** This page is a draft, and some of the contents on it are open for public comment from November 14 through December 16, 2024.

The following 3 documents (*Public Participation Plan, Disability Access Plan, and Language Access Plan*) are open for review and public comment through December 16, 2024. Please review them in order to understand how they work together.

You may submit comments on any or all of the documents using the feedback form at the bottom of this page, or by sending written comments to Abigail Okrent by email at [CivilRights.PDEQ@pima.gov](mailto:CivilRights.PDEQ@pima.gov), or by mail to 33 N. Stone Ave., 7th Floor, Tucson, Arizona 85701. You will need to submit a separate comment for each document.

All web pages are compatible with accessibility software (see icon to the left of the screen) and with translation software (see GoogleTranslate icon towards the top of the screen).

Todas las páginas web son compatibles con software de accesibilidad (ver icono a la izquierda en la pantalla) y con software de traducción (ver icono de GoogleTranslate en la parte superior de la pantalla).

### Public Participation Plan

- [Public Participation Plan \(PDF\)](#)
- [View in Browser](#)

### Disability Access Plan

- [Disability Access Plan \(PDF\)](#)
- [View in Browser](#)

### Language Access Plan

- [Language Access Plan \(PDF\)](#)
- [View in Browser](#)



PDEQ has set up a temporary web page to share the Public Participation Documents and receive feedback. The webpage is fully compatible with accessibility and translation software.

[www.pima.gov/3361](http://www.pima.gov/3361)

1 Document Feedback 2 Demographic Information (Optional)

PDEQ Civil Rights Plan Feedback Form

The [Pima County Department of Environmental Quality \(PDEQ\)](#) is seeking public comments on our Civil Rights Plan. We invite you to provide your feedback!

Fields marked with \* are required.

First Name:\*  Last Name:\*

Select Preferred Contact Method:\*

Email

Mailing Address

Which document would you like to provide feedback on?\*

**(Please submit a new comment for each plan if you have comments on more than one)**

Public Participation Plan

Language Access Plan

Disability Access Plan

Document Feedback:\*

< Back Next >

Demographic Information (Optional)

Race:

**(Select as many as applicable)**

White

Black

Hispanic

Native American or Alaska Native

Asian

Pacific Islander

Other

Gender:

Male

Female

Non-Binary

Prefer Not to Say

Other

Age:  # What is your primary language?

Do you have a disability?

Yes

No

If you live in Pima County, what are your closest cross streets?

# PDEQ's Civil Rights Program

## **Next steps:**

After public comment closes on December 16, PDEQ will make any changes we need to, and then send the drafts to the EPA for input.

Once those are finalized, we will create an internal training program so all staff understand our obligations and practices.

# What's next?

## Project 2025 EPA Chapter:

### Needed Reforms and New Policies

- **Review EPA's Environmental Justice and Title VI authority.**

Wherever possible, the Biden Administration is broadening EPA's use and interpretation of Environmental Justice (EJ)<sup>52</sup> and Title VI of the Civil Rights Act of 1964<sup>53</sup> beyond long-standing understandings of the legal limits of that authority. As a threshold matter, there is an opportunity to redefine EJ as a tool for the agency to prioritize environmental protection efforts and assistance to communities in proximity to pollution or with the greatest need for additional protection. Allocations of agency resources, increased EPA enforcement, and/or agency distribution of grants should be based on neutral constitutional principles.

In 2023, the Supreme Court is expected to provide guidance on the constitutionality of race-based discrimination as it considers *Students for Fair Admissions v. University of North Carolina*.<sup>54</sup> Accordingly, the next Administration should pause and review all ongoing EJ and Title VI actions to ensure that they are consistent with any forthcoming SCOTUS decision.

3. **The Office of Environmental Justice and External Civil Rights (OEJECR).** OEJECR was established during the Biden Administration. EJ and civil rights functions were taken from OGC and moved into a stand-alone office as well as spread through the regions. OEJECR should be disbanded; OEJECR's attorneys should be moved back into OGC; and nonlegal staff (for example, EJ Policy Advisers) should be moved back into the Administrator's office as is customary.

# What's next?

## At PDEQ:

- We haven't heard back from OEJECR since August
- Our reporting and tracking requirements will go into the ether
- We intend to continue to follow the plans because ***meaningful public participation*** remains our north star.

Questions?

**Contact**

[Abigail.Okrent@pima.gov](mailto:Abigail.Okrent@pima.gov)  
[Sarah.Hite@pima.gov](mailto:Sarah.Hite@pima.gov)

**Websites:**

[Civil Rights | Pima County, AZ:](http://www.pima.gov/3195)  
[www.pima.gov/3195](http://www.pima.gov/3195)

[Public Participation Process + Content for  
Public Review | Pima County, AZ:](http://www.pima.gov/3361)  
[www.pima.gov/3361](http://www.pima.gov/3361)