

# Fiscal Year 2025 (Program Year 2024) Tucson/Pima Annual Action Plan

(July 1, 2024–June 30, 2025)

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**PUBLIC COMMENT DRAFT**

March 2024



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## **Executive Summary**

### ***AP-05 Executive Summary - 91.200(c), 91.220(b)***

#### **1. Introduction**

The City of Tucson, Arizona, receives an annual entitlement allocation from the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and HOME Investment Partnership (HOME) Programs.

HUD outlines a broad range of eligible activities which can be undertaken by local jurisdictions using entitlement funds. The City of Tucson participates in collaborative long-range planning related to the use of HUD entitlement program funds in concert with Pima County. Long-range planning activities result in the development of a Joint Tucson/Pima County Consolidated Plan which is published every five years and defines community needs, priorities, and goals toward which entitlement funds will be directed to improve community and economic development, housing stability and affordability, and social services in the City of Tucson and throughout Pima County. The current Joint Consolidated Plan covers July 1, 2020 – June 30, 2025 and was developed with input from a diverse array of community stakeholders representing the Tucson community.

Each year, the City of Tucson produces an Annual Action Plan which more specifically describes the intended use of HUD entitlement funds in furtherance of the Consolidated Plan goals. The overarching objectives of the Consolidated Plan, and associated Annual Action Plans, seek to address challenges related to affordable housing, homelessness, and community development. By centering these challenges within the City of Tucson's efforts, the City seeks to improve the quality of life experienced by low- and moderate-income Tucsonans, enhance the physical environment of Tucson neighborhoods, expand housing opportunity, and reinforce community safety nets, especially among special needs groups including youth, older adults, and persons with disabilities.

Subject to HUD review and approval of the Program Year (PY) 2024 Annual Action Plan, the City of Tucson expects to receive the following HUD entitlement funds for the period of July 1, 2024 – June 30, 2025:

Community Development Block Grant: \$5,268,216

The primary objective of the CDBG program is to develop viable communities by helping to provide decent housing, suitable living environments, and expanding economic opportunities principally for persons of low-to-moderate income.

HOME Investment Partnerships (HOME): \$3,823,036(City/County Consortium Amount)

The HOME program is dedicated to increasing the availability of and access to affordable housing among low-income households. The City of Tucson participates in a HOME Consortium with Pima County and receives HOME Investment Partnership Program funding through the consortium. The City of Tucson acts as the Lead Agency for the Tucson/Pima County HOME Consortium.

Emergency Solutions Grant (ESG): \$475,189

The primary purpose of the ESG program is to assist individuals and families experiencing homelessness to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Housing Opportunities for Persons with AIDS (HOPWA): \$1,043,795

The HOPWA program funds housing assistance and supportive services for low-income persons with HIV and their families who are experiencing homelessness, at risk of experiencing homelessness, or unstably housed.

**2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2020-2025 Consolidated Plan\* outlines key actions planned to address the housing and community development needs of low-/moderate-income and special needs Tucson households. The City's goals and objectives, defined in the Consolidated Plan, include seven key priority areas which include:

1. Community Sustainability
2. Public Services
3. Decent, Affordable Housing
4. Homelessness
5. Economic Development
6. Housing and Services for People Living with HIV/AIDS and Their Families
7. Program Administration

These are complex community issues, the needs associated with which far outweigh HUD entitlement resources. HUD entitlement funds are leveraged by a wide variety of other local, state, and federal funds to amplify the impact of the City's housing and community development efforts.

Key outcomes from PY 2023 are provided in the next section (Evaluation of Past Performance).

\*The City of Tucson/Pima County 2020-2025 Joint Consolidated Plan is available for download at <https://www.tucsonaz.gov/hcd/plans>.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Participation of City of Tucson residents in the planning process is essential to ensuring that the City's use of HUD entitlement funds address the housing and community development needs identified and prioritized by individuals and families most affected by the funds. Citizen participation began with the creation of the five-year Consolidated Plan. During the formation of the Consolidated Plan, the City of Tucson and Pima County conducted extensive community outreach and participation activities which included 9 consolidated planning forums at which

members of the public provided input into past and future uses of HUD and leveraged funds to address housing and community development needs. In total, 110 community members contributed to Consolidated Plan goals and strategies through participation in planning forums, the feedback from which provides the overarching framework for this Annual Action Plan.

Community participation was furthered through the creation of the City of Tucson People, Communities, and Homes Investment Plan (P-CHIP) and the Housing Affordability Strategy for Tucson (HAST) in Calendar Year 2021. These guiding City plans encompass the City's housing and community development needs, priorities, and goals inclusive of, but not limited to, activities funded through HUD entitlement programs. Both P-CHIP and HAST planning included extensive community consultation and input.

P-CHIP, which provides guiding priorities for the use of ESG, HOPWA, CDBG, and City of Tucson human service fund dollars was informed by nearly 400 unique responses to a community priority survey broadly distributed to area residents and stakeholders, and four public planning meetings which included stakeholder meetings with affordable housing and homeless service providers, as well as English and Spanish language public meetings for members of the public.

HAST, which provides guiding priorities and strategies related to HOME and CDBG affordable housing, homeownership, and housing sustainable housing activities, was developed with community input from the City's Commission on Equitable Housing and Development, community stakeholders including housing advocates and developers, and the broader public through three public meetings conducted prior to plan adoption.

The PY 2024 Annual Action Plan continues to build on the successful citizen participation that informed these plans. The City conducted two public hearings related to the PY 2024 Annual Action Plan. The City conducted two community consultation public hearings in partnership with Pima County on March 14, 2024 (English language, Spanish language). In total, 46 individuals representing 34 organizations and community groups participated in these hearings at which City and County staff presented draft plan goals and funding allocations and received community input into key needs and priorities from stakeholder organizations including mandatory consultation partners, adjacent jurisdictions, and community advocates.

Informed by input received through the consultation session and needs hearings, the draft PY 2024 Annual Action Plan was posted on the City of Tucson HCD website for a 30-day public comment period from April 4-May 6, 2024. The public comment period was followed by the final Public Hearing, held before the City of Tucson Mayor & Council on May 7, 2024. Publication of the community consultation public hearings was announced on the City of Tucson website on February 26, 2024 and published in the Arizona Daily Star on March 1, 2024.

Publication of the public comment period and final public hearing before Mayor & Council was published on the City of Tucson website and in the Arizona Daily Star on March 26, 2024.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of public comments received is provided as an attachment to this plan.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

A summary of comments or views not accepted and the reasons for rejection is provided as an attachment to this plan.

**7. Summary**

As an entitlement community, the City of Tucson receives direct funding allocations from the U.S. Department of Housing and Urban Development through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) Programs. The City of Tucson supplements these funds with other local, state, and federal resources to address housing and community development needs impacting low- and moderate-income households.

The City is required by HUD to develop an Annual Action Plan which outlines the specific activities to be undertaken with entitlement funds in furtherance of the goals and objectives of the prevailing Consolidated Plan each year. This Annual Action Plan covers City Fiscal Year 2025 (July 1, 2024-June 30, 2025) during which the City of Tucson will continue to work with City residents and community stakeholders to respond to the continuing negative effects of the COVID-19 pandemic, revitalize distressed Tucson neighborhoods, spur economic development, and promote housing stability and security by investing in development and rehabilitation of affordable rental housing, subsidizing home repairs and rehabilitation for low- and moderate-income homeowners, providing housing and services for persons experiencing or at risk of experiencing homelessness, and providing specialized supports for youth, older adults, and persons with disabilities, including persons living with HIV/AIDS and their families.

## **PR-05 Lead & Responsible Agencies - 91.200(b)**

### **1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	TUCSON	Housing and Community Development Department
HOPWA Administrator	TUCSON	Housing and Community Development Department
HOME Administrator	TUCSON	Housing and Community Development Department
ESG Administrator	TUCSON	Housing and Community Development Department

**Table 1 – Responsible Agencies**

#### **Narrative**

The City of Tucson and Pima County formed a HOME consortium in 1992. As a consortium, the City and County coordinate on consolidated planning and reporting activities. The City of Tucson Housing and Community Development Department (HCD) is the lead agency for the development of the Consolidated Plan and with respect to the implementation of the annual HOME Investment Partnership Program (HOME). The City of Tucson and Pima County Consolidated Plan is carried out through individual Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

#### **Consolidated Plan Public Contact Information**

City of Tucson Housing and Community Development Department  
310 N Commerce Park Loop P.O. Box 27210  
Tucson, AZ 85726-7210  
Phone: (520) 791-4171  
Fax: (520) 791-5407  
Website: [www.tucsonaz.gov/housing-and-community-development](http://www.tucsonaz.gov/housing-and-community-development)  
Email: [HCDAdmin@tucsonaz.gov](mailto:HCDAdmin@tucsonaz.gov)



## **AP-10 Consultation - 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The City of Tucson participates in numerous efforts to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies, including: healthy homes initiatives to integrate health and housing resources; participation in the regional Continuum of Care that brings together public and assisted housing providers and health, mental health and services agencies to address the needs of the region's most vulnerable populations, including people being discharged from institutions of care; job training and placement services that integrate housing and services; initiatives to provide housing and supportive services for previously-incarcerated individuals; services that coordinate first responders and systems of care; networks that provide access to homelessness prevention resources; preferences for people with disabilities, people experiencing homelessness, and seniors in housing programs.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City of Tucson engages in community collaboration and coordination through a variety of approaches. Specifically, the City held community consultation sessions with housing providers, adjacent governments, health (including mental/behavioral health) and service agencies in preparation of the Annual Action Plan and the foundational plans on which it is built as more fully described under the Summary of Citizen Participation Process and Consultation Process heading in Section AP-05 of this Plan.

The Annual Action Plan is truly a result of year-round efforts to bolster community coordination and collaboration; however, and is supported by the following coordination activities:

Community Forums: HCD regularly partners with the local Continuum of Care, Pima County, and other stakeholders to conduct community forum activities which bring providers together to identify emerging and ongoing community needs and developed shared strategies.

Training: HCD provides training opportunities to strengthen the local housing and social services eco-system. During the past two years, these have included a variety of evidence-based and best practice training topics administered in classroom settings and through the Continuum of Care's Online Training Center which is administered by the HCD.

Public Housing: HCD acts as the City of Tucson Public Housing Authority and administers the Public Housing (PH) and Housing Choice Voucher (HCV) programs. HCD additionally maintains a consortium agreement with Pima County through which the department administers the County's PH and HCV programs.

Continuum of Care: HCD serves as the Collaborative Applicant/Lead Agency for the local Continuum of Care through which the department coordinates community-wide homeless service response, the local Coordinated Entry system, technical assistance, and the implementation of a regional homeless response system.

Intergovernmental Cooperation: HCD works closely and meets regularly with local, state, county, and Tribal governments in adjacent areas to coordinate strategic direction, resource allocation, and community activities. The City and County maintain consortium agreements through which HCD administers the Tucson-Pima County HOME Consortium and joint consolidated planning processes. The City and County recently established an inter-agency position focused on coordinating homelessness response between the jurisdictions, and HCD continues to administer HUD PHA programs on behalf of Pima County.

COVID-19 Pandemic Response Coordination: HCD has partnered closely with governmental agencies and human and housing services providers to respond to the COVID-19 pandemic, especially among low- and moderate-income persons including older adults, residents of supportive housing, and people experiencing homelessness. The City partnered with Pima County and community health and service agencies to expand non-congregate shelter options, coordinate risk-based health assessment, and deliver testing, vaccine, and health services to vulnerable populations throughout the COVID-19 pandemic.

Affordable Housing Development: HCD has partnered with other City and County departments, affordable housing developers, and elected leaders to develop and advance strategies to increase and preserve affordable housing options within the region including the partnership with City of Tucson Planning & Development Services Department to support a municipal Accessory Dwelling Unit ordinance enacted in 2021, partnership with the City Attorney's Office to support municipal Source of Income protections enacted in 2022, and shared efforts to advance transit-oriented development in partnership with City of Tucson Department of Transportation & Mobility.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Tucson Pima Collaboration to End Homelessness (TPCH) is recognized by HUD as the Continuum of Care for Tucson/Pima County, Arizona. The City of Tucson HCD has been an active member of TPCH since its creation and has served as the Collaborative Applicant/Lead Agency for the Continuum of Care since 2019. TPCH is a coalition of community and faith-based organizations, government entities, businesses, and individuals working together to end homelessness and address the issues related to homelessness in Tucson and throughout Pima County.

The overarching goal of our city-county-community homeless response system is to quickly identify persons experiencing or at risk of homelessness and provide housing and services through which they can achieve housing stability. The Mayor and Tucson City Council have emphasized the need for a Housing First approach as this model is proven to be a best practice in reducing homelessness. The goals outlined in the P-CHIP include aligning directly to the Continuum of Care strategic plan priorities and include:

- Providing stable, accessible housing or shelter with a Housing First approach
- Coordinating a continuum of services to enable vulnerable populations to access and remain in stable housing
- Supporting an efficient and effective services system based on evidence and data
- Increasing collaboration, transparency, and access to public information including collaboratively developing and implementing homelessness communications to provide better and more consistent information regarding homelessness to the public

The FY 2025 (PY 2024) Annual Action Plan was developed with direct input from the Continuum of Care. The overarching goals outlined in the consolidated plan were developed through a series of 9 community consultation sessions, including 5 sessions that specifically targeted TPCH member agencies, and ongoing coordination between the City of Tucson, Pima County, and the Continuum of Care promotes collaborative strategies to address the challenges of homelessness in our community.

In recent years, the City has worked closely with the Continuum of Care to identify critical needs and strategies to be prioritized for use of CARES Act and American Rescue Plan funds, improve consistency between City-funded homeless assistance program requirements and TPCH written standards, coordinate encampment response, improved Point in Time data collection, expand non-congregate shelter sites to reduce unsheltered homelessness, launch

regional planning initiatives, and implement Coordinated Entry system improvements through HUD technical assistance including the Housing Central Command initiative.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City collaborates with and serves as the Collaborative Applicant/Lead Agency for the Tucson Pima Collaboration to End Homelessness (TPCH) which coordinates the HUD Continuum of Care program, oversees the local Homelessness Management Information System (HMIS) and administers the local Coordinated Entry system. The Continuum of Care was invited to participate with the City in developing the People, Communities, and Homes Investment Plan through stakeholder meetings, public meetings, forums, and presentations. ESG, CDBG Public Service, and HOPWA funds were allocated through the formal P-CHIP grant solicitation. Continuum of Care members participated in grant review panels and made recommendations to HCD staff as to the allocation of resources and selection of grantees.

The Continuum of Care establishes annual performance benchmarks for ESG-funded programs in partnership with the City of Tucson, Pima County, and Arizona Department of Economic Security, each of which administer ESG funding within the region. Standard performance metrics allow for consistent measurement of ESG project performance by the Continuum of Care and entitlement jurisdictions. The Continuum of Care provides a quarterly ESG performance report to each jurisdiction which allows the City to conduct ongoing performance evaluation and monitoring using standardized HMIS data measurement.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Tucson Pima Collaboration to End Homelessness
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Publicly Funded Institution/System of Care Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Organization leadership participated in public and one-on-one consultation meetings regarding approaches to ending homelessness. Organization members were involved in selection of homeless assistance and human services projects to be funded through entitlement programs.
2	<b>Agency/Group/Organization</b>	PIMA COUNTY
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in March 14, 2024 community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
3	<b>Agency/Group/Organization</b>	FAMILY HOUSING RESOURCES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.

4	<b>Agency/Group/Organization</b>	Tucson Metro Chamber
	<b>Agency/Group/Organization Type</b>	Chamber of Commerce
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
5	<b>Agency/Group/Organization</b>	Sister Jose Women's Center
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.

6	<b>Agency/Group/Organization</b>	Hope of Glory Ministries
	<b>Agency/Group/Organization Type</b>	Services-homeless Faith Based Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
7	<b>Agency/Group/Organization</b>	United Way of Tucson
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Education Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
8	<b>Agency/Group/Organization</b>	Arizona Center for Empowerment
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
9	<b>Agency/Group/Organization</b>	The Salvation Army
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Faith Based Organ
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
10	<b>Agency/Group/Organization</b>	COPE Community Services
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
11	<b>Agency/Group/Organization</b>	Mobile Meals of Southern Arizona
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
12	<b>Agency/Group/Organization</b>	Southern Arizona AIDS Foundation
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with HIV/AIDS Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
13	<b>Agency/Group/Organization</b>	Jewish Family & Children's Services
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
14	<b>Agency/Group/Organization</b>	Esperanza en Escalante
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
15	<b>Agency/Group/Organization</b>	City of Tucson Department of Housing and Community Development
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Services-Victims of Domestic Violence

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
16	<b>Agency/Group/Organization</b>	FAMILY HOUSING RESOURCES, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
17	<b>Agency/Group/Organization</b>	Youth on Their Own
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
18	<b>Agency/Group/Organization</b>	OLD PUEBLO COMMUNITY SERVICES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with HIV/AIDS Services-homeless Services-Education Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
19	<b>Agency/Group/Organization</b>	Pima County Community Land Trust
	<b>Agency/Group/Organization Type</b>	Housing Services-Education Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.



20	<b>Agency/Group/Organization</b>	COMMUNITY FOOD BANK
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
21	<b>Agency/Group/Organization</b>	El Rio Health
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
22	<b>Agency/Group/Organization</b>	Tucson Clean & Beautiful
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Environmental Conservation

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
23	<b>Agency/Group/Organization</b>	Arizona Public Media
	<b>Agency/Group/Organization Type</b>	Media
	<b>What section of the Plan was addressed by Consultation?</b>	Public Broadcasting Service
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
24	<b>Agency/Group/Organization</b>	Community on Wheels
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
25	<b>Agency/Group/Organization</b>	Tohono O'odham Nation
	<b>Agency/Group/Organization Type</b>	Other government - Federal
	<b>What section of the Plan was addressed by Consultation?</b>	Indian Reservation
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
26	<b>Agency/Group/Organization</b>	Americorps
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.
27	<b>Agency/Group/Organization</b>	Arcadia Rose Neighborhood Association
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Homeowners Association
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Participated in the March 14, 2024, community consultation session with the opportunity for input into planned uses and priorities for CDBG, ESG, HOPWA, and HOME Program funds. The consultation resulted in the identification of key priorities for continued investment particularly related to prioritized subpopulations, housing needs, community development goals, and homeless response strategies.

**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Tucson HCD/Tucson Pima Collaboration to End Homelessness	The TPCH Strategic Plan (Community Plan to Prevent and End Homelessness) was developed in tandem with the City's People, Communities, and Homes Investment Plan. The City's Plan includes funding priorities directly built on the planning goals identified by the Continuum of Care to promote coordination of efforts and resources between ESG, CoC, CDBG, and HOPWA grantmaking.
People, Communities, and Homes Investment Plan	City of Tucson	P-CHIP defines the City's overarching housing and community development goals and serves as the guiding framework for the City's use of HUD entitlement program funds, particularly as they relate to crisis housing, public services, homeless response, and community infrastructure projects.
Housing Affordability Strategy for Tucson	City of Tucson	HAST defines the City's policy and practice goals as they relate to advancing affordable housing inventory and opportunity in the Tucson area. The strategies outlined in HAST are embedded within this Annual Action Plan and drive the use of HOME, CDBG, and leveraged funds related to affordable housing creation and preservation.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

## ***AP-12 Participation - 91.401, 91.105, 91.200(c)***

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The goals to be pursued through the FY 2025 Annual Action Plan were established through the Consolidated Planning Process and refined through the creation of the City of Tucson's 2021 People, Communities, and Homes Investment Plan (P-CHIP) and 2022 Housing Affordability Strategy for Tucson (HAST). Outreach to public and stakeholder groups related to these plans is described in Section AP-05 of this Annual Action Plan and included English and Spanish language community meetings, direct community consultation with key stakeholder groups, and web-based citizen participation tools including an online budgeting tool and place-based story mapping to localize planning input, and community surveys.

To prepare the FY 2025 Annual Action Plan, the City of Tucson additionally conducted citizen participation activities for the purposes of re-affirming that the goals established in the Consolidated Plan and strategies defined through P-CHIP and HAST remain a priority to area residents. In doing so, HCD took additional steps beyond those required by the Citizen Participation Plan to ensure broad community participation, particularly among Spanish-speaking community members and partner organizations. Activities conducted and required by the Citizen Participation Plan include 2 English-language public hearings and a 30-day public comment period. To broaden participation, HCD additionally a third public hearing which was conducted entirely in Spanish for mono-lingual and/or preferred Spanish language community members. Closed captioning for all virtual public hearings was provided and community accessibility accommodations were made available upon request.

Citizen participation activities re-affirmed the goals and strategies established in preceding plans and informed specific approaches that will be incorporated into action activities as they relate to expanding affordable housing, addressing discrimination against HCV and supportive housing subsidy holders, implementing rental housing rehabilitation activities, and addressing the needs of unsheltered people experiencing homelessness, including older adults and families with children.

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	A total of 46 community members attended the public meeting. Refer to the attached summary of comments received.	Refer to attached summary of comments received.	No comments were not accepted.	
2	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish	No individuals attended the public meeting.	No individuals attended the public meeting.	No individuals attended the public meeting.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The City of Tucson Department of Housing and Community Development funds numerous nonprofit organizations and may fund other City of Tucson departments. For most Human Service programs, organizations and activities are selected through a competitive request for proposals/calls for projects process biennially. Second-year funding is contingent upon availability of funds, continued community need, satisfactory progress toward program goals, and compliance with federal and local program requirements.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	5,268,216	0	0	5,268,216	5,268,216	Community Development Block Grant (CDBG) funds may be used for a variety of activities that meet the needs of low/moderate income residents, neighborhoods, and communities. Eligible activities include public service, and capital improvements such as infrastructure, facilities, and housing. Many activities are targeted to vulnerable populations, such as people experiencing homelessness and people with disabilities. Each activity must meet a CDBG national objective.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,823,036	0	0	3,823,036	3,823,036	The City of Tucson and Pima County created a HOME Consortium to utilize HOME Investment Partnership Program (HOME) funds to assist low/ moderate income owners and renters through new construction of housing, acquisition and/or rehabilitation of housing, tenant-based rental assistance, and homeownership assistance. 15% of HOME funds are set aside for development activities carried out by specially formed nonprofit organizations called Community Housing Development Organizations (CHDO). The City of Tucson is the lead agency for the Consortium. Approximately 70% of HOME funds are set aside for eligible activities the City and 30% for activities in Pima County outside the City of Tucson.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,043,795	0	0	1,043,795	1,043,795	The Housing Opportunities for Persons with Aids (HOPWA) program funds housing assistance and supportive services for low-income persons with HIV/AIDS and their families. HOPWA funds are administered by the City of Tucson in partnership with its subrecipient sponsor agency (Southern Arizona AIDS Foundation).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	475,189	0	0	475,189	475,189	The Emergency Solutions Grant (ESG) program provides funding to: 1) engage homeless individuals and families living on the street; 2) improve the number and quality of emergency shelters; 3) help operate shelters; 4) provide essential services to shelter residents; 5) rapidly re-house individuals and families experiencing homelessness; and 6) prevent families and individuals from becoming homeless.

Table 2 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Local and private leverage and match resources include:

1. General Fund Human Services funding for services for low-income and particularly vulnerable populations. Funds are granted to agencies through a competitive Request for Proposals process.
2. Federal Home Loan Bank resources that support savings for homeownership and provide financing for affordable housing development and preservation.
3. HOME matching funds from the City General Fund, project partners, and private resources, including sweat equity, third-party in-kind contributions, and below-market interest rate financing.
4. ESG matching funds from allowable costs incurred by sub-grantees, cash donations, and the value of third-party in-kind contributions.
5. Leveraged American Rescue Plan – State and Local Fiscal Recovery Funds used for affordable housing creation and preservation, human services, homeless assistance, and community and economic development activities.
6. State and foundation grant funds are used to deliver services at the City of Tucson and used as leverage/match to HUD entitlement programs as appropriate, particularly as they relate to public services and affordable housing.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The Housing Affordability Strategy for Tucson defines a strategy to use publicly owned land to build housing for low to moderate-income households. As such, the City of Tucson identified multiple publicly-owned sites to advance affordable housing development in the next few years. These Housing Projects include:

- Westmoreland Lots in the Menlo Park Neighborhood. A Partnership with FSL Real Estate to build affordable homeownership.
- 11th Avenue and 1st Street in the Dunbar Spring Neighborhood. El Pueblo Housing Development affordable homeownership.
- Contzen Lots in Barrio Anita Neighborhood- Partnership with Pima County Community Land Trust to develop eight single family affordable homeownership homes.
- Oracle/Alturas in the Miracle Manor Neighborhood including the Notel Motel – which has received an allocation of State Low Income Housing Tax Credit (LIHTC)s as part of Milagro on Oracle, the City’s 63-unit older adult affordable housing development slated to break ground in 2023.
- Amazon Motel redevelopment project creating 31 permanent supportive housing units.

The City of Tucson has additionally identified a list of Phase 2 sites for future development which includes:

- Stone and Speedway in the Dunbar Spring Neighborhood included in the Choice Neighborhoods Implementation Housing Plan
- Sugar Hill on Stone family house in the Sugar Hill Neighborhood included in the Choice Neighborhoods Implementation Housing Plan
- Amazon Motel vacant lot in the Flowing Wells Neighborhood included in the Choice Neighborhoods Implementation Housing Plan
- South 10th Container Maintenance Site located in the Santa Rita Park Neighborhood

## Discussion

The City of Tucson is additionally collaborating with area residents and community partners in the "Thrive in the 05" area as part of the HUD-funded FY18 Choice Neighborhoods Planning and Action Grant. Over the next year, several of the Action Activities will improve public land and public right-of-way to support the low-to-moderate income residents living in the Thrive in the 05 area. Public improvements funded by Action Activities include:

- Corridor Trees (Complete): Specialty green infrastructure streetscape improvements along major road and bike/pedestrian corridors to provide shade and cooling.
- Asphalt Art and Traffic Calming (Complete): Specialty artistic traffic calming features along major bike/ped corridors designed, built, and painted by/with residents. 4 traffic circles completed in Barrio Blue Moon and Miracle Manor neighborhoods and one crosswalk in Old Pascua neighborhood, with painting and planters prepared by neighborhood residents.
- Storytelling Public Art (Underway): Public art installations based on the history, culture, and identity of the residents of the neighborhoods. Two murals were completed and one sculpture project underway.
- Community Garden Renewal (Underway): Security improvements and new amenities to encourage increased use of the gardens, including fencing, solar lighting, and a composting toilet.
- Esquer Park Amenities (Underway): 2 new dog parks, stormwater green infrastructure, and installation of a new walking path and pedestrian bridge.
- Miracle Mile Signs and Neon Sign Restoration (Underway): Historic district branding signage includes light pole signs and stop sign toppers. Four new neon signs are in the installation process. A historic neon sign was also restored.
- Visual Improvement Program (Complete): Eight businesses were awarded façade improvement grants to improve the public facing business façade, including new signs and landscaping.
- Old Pascua/Richey Resource Center Improvements (Complete): Park/resource center improvements including playground, horseshoe pits, and athletic fields.
- The City of Tucson was awarded an FY22 Choice Neighborhoods Implementation Grant. Over the next year, the City will be working in the Thrive in the 05 neighborhood and partners to develop plans for five new neighborhood projects called "Critical Community Improvements" in addition to a proposed health clinic in the area. Choice funds will be leveraged with other federal, local, and private sources to maximize these transformative investments.

## Annual Goals and Objectives

### **AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Community Facilities and Improvements	2020	2024	Non-Housing Community Development	Citywide CDBG Target Area	Community Sustainability	CDBG: \$2,374,341	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20 Households Assisted Buildings Demolished: 6 Buildings
2	Human and Public Services	2020	2024	Non-Housing Community Development	Citywide CDBG Target Area	Human and Public Services	CDBG: \$790,232	Public service activities other than Low/Moderate Income Housing Benefit: 1500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Decent Affordable Rental and Homeowner Housing	2020	2024	Affordable Housing	Citywide CDBG Target Area	Decent Affordable Housing	CDBG: \$1,050,000 HOME: \$3,440,733	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 32 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit Homeowner Housing Rehabilitated: 101 Household Housing Unit Direct Financial Assistance to Homebuyers: 32 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 65 Households Assisted
4	Prevent and Reduce Homelessness	2020	2024	Homeless	Citywide CDBG Target Area	Homelessness	ESG: \$439,550	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted Homeless Person Overnight Shelter: 100 Persons Assisted



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Housing and Services for People with HIV/AIDS	2020	2024	Non-Homeless Special Needs	Citywide CDBG Target Area	HIV/AIDS Housing and Services	HOPWA: \$1,012,482	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted Homelessness Prevention: 200 Persons Assisted
6	Program Administration	2020	2024	Program Administration	Citywide CDBG Target Area	Program Administration	CDBG: \$1,053,643 HOPWA: \$31,313 HOME: \$382,303 ESG: \$35,639	Other: 1 Other

Table 3 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Community Facilities and Improvements
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Human and Public Services
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Decent Affordable Rental and Homeowner Housing
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Prevent and Reduce Homelessness
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Housing and Services for People with HIV/AIDS
	<b>Goal Description</b>	
6	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	

## **AP-35 Projects - 91.420, 91.220(d)**

### **Introduction**

The 5-year Consolidated Plan serves as a guide for annual investments of City and County project funds. For each of the five years covered by the Consolidated Plan, each local government is required to prepare an Annual Action Plan that correlates with the needs, priorities and goals specified in the Consolidated Plan, showing how annual entitlement funds will be allocated to meet the overall 5-year goals. The full plan can be downloaded at the City of Tucson HCD website.

The City's Consolidated Plan includes seven priority needs and related goals and activities to address priority needs:

1. Community Sustainability
2. Public Services
3. Decent Affordable Housing
4. Homelessness
5. Economic Development (addressed through non-HUD resources)
6. Housing and Services for Persons with HIV/AIDS and Their Families
7. Program Administration

Improvements to facilities and housing include energy-efficiency and disability accessibility improvements. Priority is given in many projects and programs to particularly vulnerable (special needs) populations. Decent affordable housing goals include only units assisted with Consolidated Plan funding; additional units are anticipated with leverage resources.

This section outlines projects and activities for City Fiscal Year 2025 beginning July 1, 2024 and ending June 30, 2025. Eligible projects may be directly implemented by the local government or administered through partner agencies, designated as sub-recipients. All federal regulations apply to projects that are supported with HUD formula grant funding.

<b>#</b>	<b>Project Name</b>
1	Community Facilities and Infrastructure
2	Human and Public Services
3	Decent Affordable Rental and Homeowner Housing
4	CDBG Administration and Planning
5	City of Tucson HOME Affordable Rental and Homeowner Housing
6	City of Tucson HOME Administration

#	Project Name
7	Pima County HOME Decent Affordable Rental and Homeowner Housing
8	Pima County HOME Administration
9	ESG24 City of Tucson
10	HOPWA Services for People Living with HIV/AIDS
11	HOPWA Administration

**Table 4 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The PY 2024 Annual Action Plan is responsive to key changes in the community and economy since the creation of the Consolidated Plan in 2020, particularly as it relates to recovery from the COVID-19 pandemic which resulted in new federal resources and unanticipated, prolonged delays in the supply chain, new challenges related to staffing among subrecipient agencies and contractors, and other considerations.

Economic development activities planned for in the 2020 Consolidated Plan have largely been undertaken using American Rescue Plan funds and administered through the City’s Office of Economic Initiatives. These activities include façade improvements and other business acceleration efforts.

The introduction of these unanticipated funds has allowed the City to prioritize its HUD investments in two critical areas of need, both of which have significantly worsened since the onset of the COVID-19 pandemic. These include homelessness and the shortage of affordable housing resulting in rapid and sustained market increases in recent years.

Fully addressing these community challenges will take many years and challenges persist as they relate to availability of qualified contractors, slowed production times for housing development and rehabilitation, and an uncontrolled housing market in which rental rates and home values have quickly escaped most middle-income households; leaving lower-income households with few strategies to maintain stable, affordable housing.

**AP-35 Project Summary**

**Project Summary Information**

Public Comment Draft

1	<b>Project Name</b>	Community Facilities and Infrastructure
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Community Facilities and Improvements
	<b>Needs Addressed</b>	Community Sustainability
	<b>Funding</b>	CDBG: \$2,374,341
	<b>Description</b>	Public and community facility and infrastructure improvements throughout the City of Tucson with a focus on the City of Tucson CDBG Target Area and Thrive Zones.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10,000 persons are expected to be positively impacted by the CDBG Public Facilities and Infrastructure project which supports a variety of community facility projects including parks and recreation facilities; non-profit programs for people experiencing and at risk of homelessness, older adults, youth, persons with disabilities, and other low-/moderate-income Tucsonans; street and sidewalk improvements; and other infrastructure projects located in and commonly used by low-/moderate-income persons.
	<b>Location Description</b>	Citywide with focus on the CDBG Target Area and City of Tucson Thrive Zones (Thrive in 05, 29th Street Thrive Zone).
	<b>Planned Activities</b>	CDBG funds will be used for a variety of community facility and infrastructure projects with 03 matrix codes, including but not limited to 03A (Senior Center/LMC), 03B (Facilities for Persons with Disabilities/LMC), 03C (Homeless Facilities/LMC), 03D (Youth Centers/LMC), 03E (Neighborhood Facilities/LMA), 03F (Parks and Recreation Facilities/LMA), 03G (Parking Facilities/LMA), 03H (Solid Waste Disposal Improvements/LMA), 03I (Flood Drainage Improvements/LMA), 03J (Waste/Sewer Improvements/LMA), 03K (Street Improvements/LMA), 03L (Sidewalk Improvements/LMA), 03K (Street Improvements/LMA), 03L (Sidewalks/LMA), 03M (Child Care Centers/LMA), 03O (Fire Stations and Equipment/LMA), 03P (Health Facilities/LMA), 03Q (Abused and Neglected Children Facilities/LMC), 03R (Asbestos Removal/LMA), 03S (Facilities for AIDS Patients/LMC), 03Z (Other Public Improvements/LMA or LMC).
2	<b>Project Name</b>	Human and Public Services
	<b>Target Area</b>	Citywide CDBG Target Area

<b>Goals Supported</b>	Human and Public Services
<b>Needs Addressed</b>	Human and Public Services
<b>Funding</b>	CDBG: \$790,232
<b>Description</b>	CDBG funded activities serving low-/moderate-income persons and vulnerable populations.
<b>Target Date</b>	6/30/2025
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 1,500 low-/moderate-income Tucsonans are anticipated to benefit from CDBG human and public services activities. Priority populations include children and youth, persons experiencing and at risk of homelessness, older adults, and persons with disabilities.
<b>Location Description</b>	Citywide

Public Comment Draft

	<b>Planned Activities</b>	<p>In anticipation of the PY 2024 Annual Action Plan, the City of Tucson conducted its biennial P-CHIP Human Services funding competition in Spring 2023. The City anticipates using CDBG Human and Public Services funding for CDBG-eligible activities administered by the following organizations and within the following CDBG activity codes:</p> <p>Community Food Bank - Emergency Food Assistance Program (\$150,000) (05W)</p> <p>Old Pueblo Community Services - Low Demand Shelter (\$100,000) (03T)</p> <p>Sister Jose Women's Center - Impact Project for Especially Vulnerable Women (\$85,000) (03T)</p> <p>Community Food Bank - Tucson House Emergency Food Distribution Project (\$50,000) (05W)</p> <p>Pima Council on Aging - Homecare Services/Attendant Care (\$50,000) (05A)</p> <p>Compass Affordable Housing - Tucson Home Based Program (\$50,000) (05Z)</p> <p>Primavera Foundation - Casa Paloma (\$50,000) (03T)</p> <p>City of Tucson HCD - Homeless Street Outreach (\$201,982) (03T)</p> <p>City of Tucson HCD - Coordinated Entry Assessment and Operations (\$53,250) (03T)</p> <p>*Inclusion in this list indicates an intention to award CDBG program funds at the time of this plan preparation. Inclusion of an organization/project in the list above does not represent a binding commitment of FY 2025 CDBG funding by the City of Tucson. Final project selection, award amounts, and activities may vary and may include any CDBG-eligible public services activities deemed necessary and responsive to community priorities by the City of Tucson.</p>
<b>3</b>	<b>Project Name</b>	Decent Affordable Rental and Homeowner Housing
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Decent Affordable Rental and Homeowner Housing
	<b>Needs Addressed</b>	Decent Affordable Housing
	<b>Funding</b>	CDBG: \$1,050,000



	<b>Description</b>	The City of Tucson conducts a variety of rental and homeownership housing activities to develop and preserve affordable housing opportunities for low-/moderate-income Tucsonans through the CDBG program.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City of Tucson expects to provide residential rehabilitation services for 100 single and/or multi-family units
	<b>Location Description</b>	Citywide with focus on CDBG Target Area and City of Tucson HAST Investment Districts including City of Tucson Thrive Zones
	<b>Planned Activities</b>	Rehabilitation of affordable rental housing units and units owned by low-/moderate-income homeowners; acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, and permanent supportive housing.
<b>4</b>	<b>Project Name</b>	CDBG Administration and Planning
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$1,053,643
	<b>Description</b>	Administration and planning activities undertaken by the City of Tucson, its subrecipients, and/or contractors in fulfillment of CDBG activities and requirements.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
	<b>Location Description</b>	CDBG administrative activities are generally undertaken by City of Tucson Housing and Community Development staff (310 N. Commerce Park Loop, Tucson, AZ, 85745).

	<b>Planned Activities</b>	These funds will be used to administer all CDBG activities and to support fair housing and planning initiatives.
5	<b>Project Name</b>	City of Tucson HOME Affordable Rental and Homeowner Housing
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Decent Affordable Rental and Homeowner Housing
	<b>Needs Addressed</b>	Decent Affordable Housing
	<b>Funding</b>	HOME: \$2,210,682
	<b>Description</b>	HOME funding and program income will be used for acquisition, development, and/or rehabilitation of rental and homeowner housing; rental assistance; and down payment assistance for low-/moderate-income homebuyers.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City of Tucson anticipates benefiting 200 individuals including low-/moderate-income renters and homeowners.
	<b>Location Description</b>	Citywide with a focus on HAST Investment Districts
	<b>Planned Activities</b>	Acquisition and/or rehabilitation of affordable rental housing, including energyefficiency, disability accessibility improvements, temporary or permanent relocation, permanent supportive housing and HOME-funded transitional housing. Construction of affordable rental housing, including permanent supportive housing and transitional housing. Monthly rental assistance and security and utility deposits. Assistance to low-income home buyers. Construction of or acquisition/rehabilitation/resale of affordable homeowner housing
6	<b>Project Name</b>	City of Tucson HOME Administration
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$278,964
	<b>Description</b>	Administration of HOME program in fulfillment of HOME activities and requirements.

	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	HOME administrative activities are generally undertaken by City of Tucson Housing and Community Development staff (310 N. Commerce Park Loop, Tucson, AZ 85745).
	<b>Planned Activities</b>	City of Tucson HOME program administration
<b>7</b>	<b>Project Name</b>	Pima County HOME Decent Affordable Rental and Homeowner Housing
	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent Affordable Rental and Homeowner Housing
	<b>Needs Addressed</b>	Decent Affordable Housing
	<b>Funding</b>	HOME: \$930,051
	<b>Description</b>	New construction, acquisition, and/or rehabilitation of rental and homeowner housing units; down payment assistance (upon program income availability) for low-/moderate-income households.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	46 households/units (construction, acquisition, and/or rehabilitation).
	<b>Location Description</b>	County-wide
	<b>Planned Activities</b>	Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, permanent supportive housing and HOME-funded transitional housing. Construction of affordable rental housing, including permanent supportive housing and transitional housing. Assistance to low-income home buyers. Construction of or acquisition/rehabilitation/resale of affordable homeowner housing.
<b>8</b>	<b>Project Name</b>	Pima County HOME Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Program Administration

	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$103,339
	<b>Description</b>	Administration of the HOME program in accordance with HOME activities and requirements.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	County-wide, activities generally administered at Pima County locations (Housing Center, Community & Workforce Development Department, etc.)
	<b>Planned Activities</b>	Administration of the Pima County HOME program in accordance with HOME activities and requirements.
9	<b>Project Name</b>	ESG24 City of Tucson
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Prevent and Reduce Homelessness
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	ESG: \$478,189
	<b>Description</b>	ESG funds will support Street Outreach, Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and/or Administration activities.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	ESG funds are anticipated to provide emergency shelter for 200 or more persons, rapid rehousing assistance for 30 individuals fleeing or attempting to flee domestic abuse, homelessness prevention assistance for 20 or more public housing residents, and outreach services reaching 200 or more persons in Program Year 2024.
	<b>Location Description</b>	Services are provided throughout the City of Tucson.

	<b>Planned Activities</b>	<p>Planned activities include the following:</p> <ul style="list-style-type: none"> <li>• Street Outreach: Administered by the City of Tucson and/or subrecipient agencies (\$30,113)</li> <li>• Emergency Shelter: Administered by the City of Tucson and/or subrecipient agencies (\$255,000)</li> <li>• Rapid Rehousing: Administered by the City of Tucson and/or subrecipient agencies (\$50,000)</li> <li>• Homelessness Prevention: Administered by the City of Tucson and/or subrecipient agencies (\$104,437)</li> <li>• Program Administration: Administered by the City of Tucson (\$35,639)</li> </ul>
10	<b>Project Name</b>	HOPWA Services for People Living with HIV/AIDS
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Housing and Services for People with HIV/AIDS
	<b>Needs Addressed</b>	HIV/AIDS Housing and Services
	<b>Funding</b>	HOPWA: \$1,012,482
	<b>Description</b>	This project includes HOPWA project funds including sponsor admin costs administered by the project sponsor(s).
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will positively impact 245 individuals who are members of households in which one or more household member are persons living with HIV/AIDS.
	<b>Location Description</b>	Services are provided in scattered-site rental units and the Southern Arizona AIDS Foundation offices located at 375. S. Euclid Avenue, Tucson, AZ 85719.

	<b>Planned Activities</b>	Intra-project cost allocations are expected to be as follows (subject to change without substantial amendment to the Annual Action Plan): <ul style="list-style-type: none"> <li>• Short-Term Rent, Mortgage, and Utility Assistance (\$100,000)</li> <li>• Tenant-Based Rental Assistance (\$369,922)</li> <li>• Supportive Services (\$220,540)</li> <li>• Transitional Shelter (\$280,685)</li> <li>• Sponsor Admin (\$41,335)</li> </ul>
<b>11</b>	<b>Project Name</b>	HOPWA Administration
	<b>Target Area</b>	Citywide CDBG Target Area
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOPWA: \$31,313
	<b>Description</b>	Administration of HOPWA program in accordance with HOPWA activities and program requirements.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
	<b>Location Description</b>	Administrative activities are primarily conducted at the City of Tucson Housing and Community Development Department offices (310 N. Commerce Park Loop, Tucson, AZ 85745).
<b>Planned Activities</b>	City of Tucson administration of the HOPWA program.	

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Recognizing disparities in income, employment, housing conditions, and choice, as well as facilities that are indicators of urban stress, the City of Tucson adopted a Community Development Block Grant (CDBG) Target Area in the program year 2013. The Target Area was updated with the 2020-2024 Consolidated Plan. The Target Area is made up of connecting Census Block Groups where more than 50% of households earn no more than 80% of the area median income (“low/moderate-income households”). The Target Area consists of approximately 18.3% (44 square miles) of the City of Tucson. The 2022 estimated population of the Target Area is 211,524 persons, approximately 38.7% of the population of the City of Tucson.

The Target Area is the focus of determined efforts of the Consolidated Plan Public Facilities resources. These resources will be set aside for such uses as parks, street and sidewalk improvements, homeless shelters, and public bathrooms. Eligible use for these funds is based on the income of the households within the service area for the proposed facility.

Funding is also devoted to serving individuals and households anywhere in the City based on the income eligibility of individual households with a particular focus on improvements to the City of Tucson’s two Thrive investment zones.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	40
CDBG Target Area	60

**Table 5 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Due to socio-economic and housing conditions in the city’s target area and the Thrive investment zones, these areas are the primary focus of concerted investment of CDBG resources for public facilities and infrastructure. However, low/moderate-income households and particularly vulnerable populations reside throughout the city, funding is also dedicated to

servicing these individuals and households outside of the target area.

## **Discussion**

At the direction of Mayor and Council, the City of Tucson has identified two City areas which are prioritized for comprehensive community investment including but not limited to community services such as those funded through this solicitation, public infrastructure, housing development and rehabilitation, economic development activities, public arts, and other neighborhood revitalization efforts. There are currently two established Thrive Zones as further described below. The Thrive Approach goes beyond typical neighborhood planning and looks holistically at a place, identifying a vision to transform both the built environment and opportunities for residents to thrive through education, services, and jobs. The approach also integrates resident-driven strategies for crime reduction and public safety. A resulting Transformation Plan identifies joint goals and strategies that lay the groundwork to direct future investment. An additional key component of the Thrive Approach is funding for early implementation projects called Action Activities. These projects serve to build community trust and buy-in for the planning process, as well as to kick-start implementation of the Transformation Plan.

### **Thrive in the 05 Area**

The Oracle/Miracle Mile area is targeted for Tucson Innovations in Community Based Crime Reduction (CBCR) is a 1.45 square mile area in the 85705 zip code and is bounded by Miracle Mile to the north, Fairview Avenue and Interstate 10 to the west, Speedway Boulevard to the south, and Stone Avenue to the east.

The Oracle/Miracle Mile area was once a vital automobile gateway into Tucson. Filled with historic structures, it was the site of booming tourism, and dubbed “Miracle Mile” by Arizona Highways magazine. The area remained vital through the 1960s, even after the construction of Interstate 10 in 1958, which replaced Miracle Mile as the main thoroughfare in Tucson. In 1963, Tucson House was built as a 17-story luxury apartment complex. By the 1970s, the area began a steady decline as travelers started using alternative routes, and numerous motels in the area became a magnet for prostitution, drugs, and crime. The abandoned Tucson House became Section 8 Public Housing in the 1980s. Despite its unique historical character, the Oracle area currently faces many challenges that limit opportunities for community and economic



development.

Learn more about the Thrive in the 05 initiative at <https://www.thriveinthe05.com/>.

### **29th Street Thrive Zone**

In June 2022, the City of Tucson Mayor and Council approved the launch of a second Thrive Zone which is bounded by 22nd Street to the north, Golf Links to the south, Alvernon to the west, and Craycroft to the east. This area was selected after comparative review of multiple City areas which accounted for community challenges such as violent crime and neighborhood vulnerability alongside community assets and strengths such as the presence of anchor institutions (schools and healthcare facilities), existing neighborhood and community-based leadership, and a shared community identity.

Learn more about the currently developing 29th Street Thrive Zone initiative at <https://29thstreet.tucsonaz.gov/>.

## Affordable Housing

### ***AP-55 Affordable Housing - 91.420, 91.220(g)***

#### **Introduction**

The City of Tucson plans to provide affordable housing assistance for 400+ households. This includes rapid rehousing and permanent housing for persons experiencing homelessness, tenant-based rental assistance for the homeless and special needs populations, new construction and rehabilitation of rental units, homeowner rehabilitation, and homebuyer assistance. In addition, the City will use General Fund dollars to provide low-income households with Acute Emergency Home Repairs as well as accessibility adaptation, home repair, and maintenance assistance for low-income older adults and persons with disabilities.

The City of Tucson anticipates achieving the following immediate outcomes during PY 2024 as they relate to affordable housing:

- Supporting 75 or more households experiencing homelessness (65 households assisted to enter voucher programs through HOME tenant-based rental assistance and 10 households to receive ESG rapid rehousing or homelessness prevention assistance).
- Supporting 280 or more non-homeless households to maintain stable housing including 200 households assisted through HOPWA short-term rent, mortgage, and utility assistance; and 80 households assisted through CDBG and HOME owner-occupied and rental housing rehabilitation activities.
- Supporting 45 special-needs households comprised of one or more persons living with HIV/AIDS to obtain and maintain stable housing through HOPWA tenant-based rental assistance.

#### **One Year Goals Detail:**

- Rental Assistance: 65 households - HOME tenant-based rental assistance; 45 households - HOPWA tenant-based rental assistance, 10 households - ESG rapid rehousing/homelessness prevention.
- Production of New Units: 20 homeownership units created through HOME program.
- Rehab of Existing Units: 80 rental and homeownership units rehabilitated through HOME and CDBG programs.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	75
Non-Homeless	280
Special-Needs	45
Total	400

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	120
The Production of New Units	20
Rehab of Existing Units	80
Acquisition of Existing Units	0
Total	220

**Table 6 - One Year Goals for Affordable Housing by Support Type**

**Discussion**

The City of Tucson and Pima County may fund rental housing that limits eligibility or gives a preference to a particular segment of the population. Except for rental housing that also receives funding from a federal program that limits eligibility to a specific population, when limiting eligibility or giving a preference 1) the limitation or preference must be limited to households with disabilities that significantly interfere with their ability to obtain and maintain housing; 2) households that would not be able to obtain or maintain themselves in housing without appropriate supportive services; and 3) the supportive services cannot be provided in a non-segregated setting. The households must not be required to accept the services offered at the project and the project owner must advertise the project as offering services for a particular type of disability. The project must be open to all otherwise eligible persons with disabilities who may benefit from the supportive services provided.

## ***AP-60 Public Housing - 91.420, 91.220(h)***

### **Introduction**

The City of Tucson Public Housing Program owns and operates 1,505 public housing units and an additional 400+ affordable housing units throughout the City of Tucson and Pima County. The PHA provides housing to 3,228 public housing residents, 970 of whom are members of low to extremely low-income families. The average income of those families currently receiving housing assistance through the public housing program is \$16,548.23.

### **Actions planned during the next year to address the needs to public housing**

In the coming year, the City of Tucson intends to develop a long-term repositioning plan to include modernization, disposition, and purchasing of units based on the assessment completed by Praxis Consulting Group, LLC. Based on recommendations from Praxis, the City of Tucson's next action items are to rank properties within the portfolio based on standardized metrics to create a pool of properties to reposition. Once ranked properties are in place the Praxis recommended strategies can be explored including selling, collaborating with non-profit groups, and full home ownership opportunities.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The PHA continues to expand the efforts of establishing resident councils across all the AMP offices. Resident councils work in collaboration with PHA staff to support public housing operations and resident quality of life. Public Housing continues to support Resident Councils at the Tucson House and MLK apartments. Public housing residents are also represented on the City of Tucson Commission on Equitable Housing and Development which provides guidance and direction to the City of Tucson HCD and elected officials. The PHA encourages public housing residents to participate in homeownership through the Family Self Sufficiency (FSS) Program. The FSS program provides financial literacy, budgeting, skill development, and supportive services to promote homeownership readiness. Participants establish an escrow savings account during participation which can be used for down payment and/or closing costs; and is often supplemented by down payment assistance programs administered by HCD and other homeownership programs. Public Housing continues to encourage our residents in participating in the FSS program and home ownerships.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be**

**provided or other assistance**

The City of Tucson and Pima County PHAs are not designated as troubled. Not applicable.

**Discussion**

Not applicable.

Public Comment Draft

## ***AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)***

### **Introduction**

This section describes the City's activities to address the needs of people experiencing homelessness and special needs populations.

The City's Coordinated Entry administration, jointly managed by the HCD Continuum of Care Lead Agency and Housing First teams, includes sub-recipient partnerships through which coordinated entry outreach and housing placement is conducted within the city, Tribal areas, and rural areas of the County. Coordinated Entry assessment, shelter arrangement, diversion, and housing problem-solving are coordinated by a network of sub-recipient Access Points 7 days/week in English and Spanish, with translation in other languages available as needed. In February 2023, HUD announced that the Tucson/Pima County Continuum of Care was selected for funding through the Supplemental CoC funding opportunity to address unsheltered homelessness which will include expansion of street-based outreach services, permanent supportive options, and system infrastructure to better address homelessness.

At the time of preparation of this Plan, the City is actively working with Pima County and the Continuum of Care to implement a collaborative action plan to address rising rates of homelessness in the region and is engaged in HUD's Housing Central Command initiative.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The local Continuum of Care coordinates outreach activities across the region through partnerships between the City of Tucson, Pima County, behavioral health entities, and local non-profit outreach programs. The City of Tucson street outreach team leads the Continuum of Care's Outreach Coalition which meets monthly to share information and resources, and coordinates targeted outreach initiatives including coordinated targeting of large encampments for service engagement and housing navigation.

These efforts have proven effective in reaching unsheltered persons experiencing homelessness, increasing service engagement, and facilitating transitions to shelter, transitional, and permanent housing solutions.

The recently developed Housing First Division is embedded within HCD and coordinates inter-

departmental response to unsheltered homelessness, encampments, and shelter pathways. This division includes the City's street outreach team, Coordinated Entry navigation and assessment team, HEART Navigation and Community Safety Navigation teams, homeless protocol administrators, mobile shower, and emergency shelter programs.

The City's homeless protocol uses a standardized encampment assessment tool to guide response to encampments on public property. This focuses limited resources in encampments with greatest health and safety risk, while deploying outreach and supportive services personnel to lower-risk encampments for the provision of basic needs provision and shelter coordination.

In FY24, the City's outreach programs expanded to include a multi-disciplinary outreach team and volunteer outreach program funded through HUD's CoC Supplemental funding to address unsheltered homelessness.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

ESG, CDBG, non-entitlement General Fund, HOPWA, and federal pandemic relief resources are used to support emergency shelter and transitional housing activities throughout the community. In addition to subawards delivered to non-profit organizations for the administration of emergency shelter and transitional housing programs, the City will directly coordinate delivery of emergency and transitional housing solutions at City-owned sites including:

- Desert Cove Non-Congregate Bridge Shelter Residence (operated by Community Bridges, Inc.)
- Wildcat Non-Congregate Bridge Shelter Residence (operated by City of Tucson)
- Bread & Roses Crisis Transitional Housing Project (operated by Old Pueblo Community Services)
- Amazon Non-Congregate Bridge Shelter Residence (operated by City of Tucson)
- S. Sixth Congregate Shelter (operated by Old Pueblo Community Services)
- Craycroft Non-Congregate Shelter (operated by Pima County)

With braided CDBG, HOME-ARP, and Congressionally Directed Spending, the City will re-develop a vacant fire stations into the Amphi Housing First Resource Center and Shelter during PY24.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The Continuum of Care (TPCH) maintains an active by-name list approach which is consistent with federal benchmarks and is used to prioritize people experiencing current housing crises for limited

supportive housing resources. This reduces the frequency at which housing referrals are made for households that cannot be located or that have self-resolved through other resources. TPCH utilizes solutions-focused case conferencing procedures with separate case conferencing sessions for vulnerable subpopulations including veterans, people experiencing chronic homelessness, and youth.

Current, planned and recent initiatives to increase and expedite permanent housing placement at the City include:

- Launch of the Housing First Program which currently includes street outreach, housing navigation, and emergency shelter services (FY21).
- Acquisition and launch of six low-barrier shelter programs (FY21-FY25).
- Conversion of retired fire station to low-barrier bridge shelter program (FY25).
- Acquisition and rehabilitation of 30-unit motel for conversion to permanent supportive housing (FY24).
- Launch of two permanent supportive housing projects (150 units) at Community Bridges, Inc. and Old Pueblo Community Services through HUD supplemental unsheltered homelessness funding (FY24).
- Acquisition and conversion of Amazon Hotel for adaptive reuse as permanent supportive housing by Old Pueblo Community Services (see above).
- Conversion of congregate domestic violence shelter to non-congregate shelter (FY24)
- Construction of 63-unit Milagro on Oracle affordable housing property including 19 permanent supportive housing units for older adults (FY24-25)
- Administration of Youth Homelessness Demonstration Project which includes approximately 100 housing navigation and transitional (host home)/permanent housing beds for unaccompanied youth.
- Launch of the Tucson Housing Emergency Action Response Team (HEART) which includes 6 additional housing navigators who work alongside the CoC to provide housing location and access support for vulnerable households with a focus on rapid entry to supportive housing through Coordinated Entry and/or direct referral to HCV and PH subsidies.
- HUD Housing Central Command initiative (FY24).

HCD additionally works closely with TPCH member agencies and other homeless service providers to identify and address community needs. Recent activities include:

- Creation and publication of monthly unsheltered resource guide during the COVID-19



pandemic (2020-2023)

- Hosted Critical Time Intervention Train the Trainer series (2022)
- Publish daily shelter availability bed report (2020-2023)
- Increased CoC and CDBG funding for housing navigation services to expedite permanent housing move-in among subpopulations with complex housing barriers (2020-2023)
- Hosted homeless services job fair in partnership with TPCH and Pima County One-Stop to address staffing shortages in homeless service agencies (2022)
- Increased allocation of public housing and Housing Choice Vouchers for households exiting homelessness and/or moving on from homeless assistance program housing (2021-2023)
- Expanded bridge shelter offerings to reduce unsheltered homelessness and expedite permanent housing move-in among vulnerable populations (2021-2023)
- Hosted two-day unsheltered homelessness planning forum and convened working group for regional homeless action plan (2022-2023).
- Launched HUD Housing Central Command initiative to expedite placement from encampments to permanent housing (2023-2024).

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Individuals and families can access homelessness prevention resources across a continuum based on the immediacy of their risk, current housing situation, and family resources. The type of services varies by funding source ranging from rent/utility assistance only to a broad range of prevention assistance (transportation, vehicle repair, daycare, etc.) to help people remain stably housed. People being discharged from a publicly funded institution of care also have access to these resources along with specialized coordination of services through nonprofit agencies that address the risk of homelessness among the re-entry population, and through agencies that work with health care facilities to prevent discharge into homelessness. Additionally, families can receive assistance from their child(ren)'s school through McKinney-Vento funds providing transportation, school supplies, free breakfast and lunch, case management/advocacy, and other services.

Additional prevention services include programs aimed at maintaining people in their homes, i.e. rent and mortgage assistance, utility payment assistance to prevent eviction, case

management, housing counseling, landlord/tenant mediation and legal services, behavioral health services, referral services, income maintenance programs and food stamps, job training and placement, and guardianship/representative payee programs. In addition, prevention programs include education regarding an owner/landlord’s specific requirements, and information on tenants’ rights and obligations under Arizona law.

**Discussion**

Funding to agencies is provided through subrecipient agreements between the non-profit agency and the City Housing and Community Development Department. The agreement contains terms and conditions of funding, reporting and invoice requirements, performance and outcome expectations and service delivery levels, record keeping responsibilities, and consent to on-site monitoring. Funds are awarded on a competitive basis. The City of Tucson and Pima County coordinate funding allocations to maximize community benefit. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum of Care. Every effort is made to involve in the process one or more persons with lived experience of homelessness and/or housing instability.

**AP-70 HOPWA Goals - 91.420, 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	200
Tenant-based rental assistance	45
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	3
<b>Total</b>	<b>248</b>

## ***AP-75 Barriers to affordable housing -91.420, 91.220(j)***

### **Introduction**

Both local and federal public policies on affordable housing and residential investment may increase the cost of housing or cause costly delays. Participants in Consolidated Plan forums discussed HUD program barriers including lengthy processes, increasing data collection and variable data collection requirements, and the regulatory knowledge necessary to maintain compliance with a myriad of conflicting program requirements.

Forum participants also discussed local regulations that increase the cost of development, specifically the sometimes-lengthy rezoning and variance processes, lack of a fast track permitting process, excessive parking and landscaping requirements, and modular housing requirements. A follow-up meeting with developers revealed challenges with the focus of funding on vulnerable populations, lagging HUD data that doesn't reflect current market conditions, high cost of construction, insufficient inventory of appropriately zoned land, and a NIMBY (Not in My Backyard) sentiment. Specific to the City of Tucson, participants cited the lack of an expedited permitting process and complex overlay district processes.

The City of Tucson, Pima County, and other incorporated jurisdictions in Pima County completed HUD's Regulatory Barrier Questionnaire and identified possible barriers. Identified barriers included: no examination of the need for housing for households at various income levels; no assessment of conformance of the zoning ordinance and map, development and subdivision regulations or other land use controls with the general plan housing element and lot and setback requirements to determine if they may be excessive for multi-family housing; no comprehensive studies, commissions or hearings to review the rules, regulations, development standards and processes to assess their impact on the supply of affordable housing; and neighborhood opposition to infill and higher density development in some areas.

Over the past several years, the cost of housing has risen dramatically in Tucson and throughout the region. Since 2017, the median rent in Tucson rose 86% and as of February 2023 was over \$1,600. The existing challenges related to housing affordability and access have been exacerbated by the COVID-19 pandemic and related state and national eviction moratoria. The City of Tucson and Pima County are working on the creation of an updating data dashboard to provide real time information regarding these statistics as they change through the next several years.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Tucson HCD continues to partner with other governmental agencies to reduce barriers to affordable housing development and preservation, and actively advocates for changes to local policies, codes, and ordinances that present barriers to affordable housing activities as well as waivers to such policies as they relate to affordable housing development.

Source of Income Protection

HAST Plan strategic priority for source of income protection was adopted by Mayor & Council in 2022, establishing a local ordinance prohibiting source of income discrimination. The City of Tucson is currently working to expand its fair housing education and enforcement activities to include this additional consumer protection.

Accessory Dwelling Units (ADU)

The ADU ordinance amendment was approved in 2021 with a 5-year sunset review period during which, HCD and community partners continue to seek to leverage ADUs to:

- Increase affordable rental housing supply
- Encourage more flexible housing options for seniors
- Support multi-generational households and living arrangements
- Provide supplemental income to landowners and promote neighborhood stability
- Support climate-resilient infill development in context with existing neighborhoods

In April 2023, HCD rolled out an ADU improvement pilot program to provide financial and technical assistance to low-income homeowners within the City of Tucson to improve an existing ADU or accessory structure.

Impact Fee Waivers

In March 2022, Mayor and Council approved Ordinance 119119 to expand the local impact fee waiver eligibility to additionally include for-profit developers as well as to expand the City's affordability terms to 20 years, 100% AMI in order to more broadly incentivize development

across the spectrum of affordable housing need in the City.

### Incorporating Incentives into Planning and Overlay Zoning on Transit Corridors

The Tucson Mayor and Council adopted the second affordable housing density bonus in Tucson in December 2022, as part of the Infill Incentive District. This allows for density bonuses and other development standard relief for projects within the district that include 15% Affordable units. It also expanded to allow residential within the industrial zone districts throughout the entire IID as opposed to the one sub-district originally included.

#### **Discussion**

Not applicable.

### ***AP-85 Other Actions - 91.420, 91.220(k)***

#### **Introduction**

This section describes the City's efforts to address underserved needs, expand and preserve affordable housing, reduce lead-based paint hazards, develop institutional structure for delivering housing and community development activities, and address identified impediments to fair housing choice.

#### **Actions planned to address obstacles to meeting underserved needs**

The City's central long-term community development goal is to focus resources on community needs, particularly investment in distressed areas and areas with high levels of poverty. Assisting low- and moderate-income households throughout the City is a community goal intended to ensure that neighborhoods not currently in distress do not become so. The City's General Plan – Plan Tucson - supports a framework of local policies that can significantly and positively impact housing and other needs of low- and moderate-income residents and neighborhoods. The City's expectations are focused on sustainability, reserving land for economic development, and investment in areas experiencing disinvestment. While many of the City's General Plan goals and policies are inter-related with Consolidated Plan goals and policies, the most relevant housing and community development goals include stabilizing and improving the existing housing stock, increasing affordable housing options, and supporting programs that expand economic development opportunities.

The City of Tucson will support non-profit agencies that provide:

- Support for older adults including emergency repairs, senior companion program,

independent living support, mobile meals, nutrition programs, and homecare services.

- Support for youth and families including childcare, early childhood development, daycare tuition support, parent education and support, and after school programs.
- Support services including temporary shelters for people experiencing homelessness and domestic violence survivors, and other support such as case management and emergency food assistance.

### **Actions planned to foster and maintain affordable housing**

During the coming year, the City will:

- Promote homeownership by providing down payment and closing cost assistance to low- and moderate-income households in partnership with local HUD-approved housing counseling agencies, locally approved Community Housing Development Organizations, and Industrial Development Authorities.
- Promote the development of affordable housing to serve low-income homebuyers and renters.
- Prioritize projects that maximize leveraged funding from other public and private resources such as the Low-income Housing Tax Credit Program; Federal Home Loan Bank Affordable Housing, and WISH and IDEA Programs.
- Continue monitoring of previously funded affordable housing activities for compliance with federal and local regulations.

To address impediments to fair housing choice, the City will:

- Continue funding for fair housing education, outreach and enforcement activities. Housing professionals from the nonprofit and for-profit sectors (i.e. property managers, developers; realtors; mortgage lenders; mortgage insurers; and others) and consumers will be encouraged to attend fair housing and/or affirmative marketing training.
- Monitor trainings to housing consumers about fair housing rights and responsibilities.
- Provide fair housing literature at the City Housing and Community Development Department, community facilities, and other locations throughout the City.
- Require robust affirmative marketing by recipients of HCD funds.
- Affirmatively further fair housing by encouraging investment in projects and programs to benefit people living in areas of racial and ethnic concentrations, or that assist residents to relocate to areas of high opportunity.
- Celebrate Fair Housing Month by organizing one or more community awareness

campaigns and/or events.

- Comply with updated Affirmatively Furthering Fair Housing Rule requirements.

### **Actions planned to reduce lead-based paint hazards**

Any structure built before 1978 that is proposed for rehabilitation under federal programs is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. Licensed contractors are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

The City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, requiring contractor and subcontractor compliance with guidelines. Rehabilitation activities are procured through a bidding process and contracted to licensed contractors. All contractors and subcontractors are required to comply with HUD Lead Safe Housing requirements and federal National Environmental Policy Act environmental review procedures. In addition, the City follows a multi-pronged approach to reduce lead hazards:

- **Housing Choice Vouchers:** The PHA inspects prospective dwellings constructed prior to 1978 that will have a child under the age of six residing therein, for compliance with EPA and HUD Lead Based Paint rules and regulations. The inspection includes visual inspections for chipped, peeling, chalking and deteriorated interior and exterior paint. Clearance testing may be performed after remediation by the property owner, to assure a lead-safe environment.
- **Public Education:** Lead Hazard Information is distributed to participants in homeownership and rental programs including distribution of HUDs Protect Your Family from Lead in your Home brochure.

The City of Tucson HCD additionally administers a \$3.9 million Lead based Paint Hazard Reduction + Healthy Homes Program grant through which lead based paint education, testing, and abatement activities are conducted throughout the local area.

### **Actions planned to reduce the number of poverty-level families**

The City of Tucson will take multiple efforts that combined will reduce the incidence of poverty and help people move from crisis to stability. Most activities undertaken with CDBG, HOME, ESG and HOPWA funds are efforts to reduce the number of persons living in poverty and improve the quality of life for city residents.

The City will continue its economic development efforts through its Office of Economic

Initiatives, working cooperatively with employers, workforce investment agencies, and education agencies to promote jobs-based education and services to help lower-income households attain higher-wage employment.

In addition, the City will continue to support emergency assistance programs and a variety of other support services needed by low-income households to obtain basic necessities and avert crisis and homelessness.

The City will also continue to incorporate training for contractors and other private sector entities to increase understanding of and participation in HUD programs, with emphasis on Section 3 and Labor Standards that promote economic self-sufficiency.

In 2023, the City updated the Poverty and Urban Stress report, which documents disparities in urban stress based on factors such as income levels, education, housing issues and incidence of crime. <https://povreport.tucsonaz.gov/>.

#### **Actions planned to develop institutional structure**

The City has taken considerable steps in recent years to strengthen its institutional structure including, but not limited to:

- Created City of Tucson Commission on Equitable Housing and Development and convening of Commission subcommittees focused on housing segregation and permanent supportive housing
- Accelerated deployment of CARES Act and American Rescue Plan funds
- Implemented landlord incentive and engagement programs
- Created inter-departmental Housing First and Community Safety programs aimed at addressing homelessness and critical community needs
- Enacted Source of Income Protections
- Established dedicated monitoring, compliance, and community engagement teams
- Updated entitlement program policies and procedures in partnership with consortium partner, Pima County

In the coming year, the City anticipates further developing administrative infrastructure in partnership with our consortium partner, Pima County as follows:

- Establishing additional subrecipient and staff training programs to promote program



compliance and professional administration of grant program funds

- Increasing coordination of eviction prevention and homelessness prevention services
- Utilizing housing vouchers to address rising rates of homelessness in the region
- Deepening collaboration in entitlement subrecipient grantmaking processes

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The City and County will continue to work together and with public and private housing and social service agencies to build trust and expand a collaborative mindset that honors the contributions, needs and perspectives of local service providers. As the collaborative applicant for Continuum of Care Program funding, the City of Tucson will continue to work with public and private housing and social service agencies to improve coordination between workforce development resources and Housing Choice Voucher and public housing programs for people experiencing homelessness. The Continuum of Care (COC) Program Written Standards are available at <https://tpch.net/about/tpch-governing-documents/>.

### **Discussion**

#### **People, Communities, and Homes Investment Plan**

The People, Communities, and Homes Investment Plan (P-CHIP) was developed in 2020 to serve as a foundation for Housing and Community Development department (HCD) programs and funding allocations for the next five years. It is meant to provide the starting point, offer direction and scope, and create a framework for decision making. It is the intent and expectation that this foundation will be built on over time; setting a guidepost while offering flexibility and space for changing priorities and changing needs. The People, Communities, and Homes Investment Plan is available at <https://p-chip.tucsonaz.gov/pages/plan>.

#### **Housing Affordability Strategy for Tucson**

The Housing Affordability Strategy for Tucson (HAST) was published by City of Tucson HCD and approved by Mayor and Council in December 2021. The housing affordability strategy uses available data and environmental scan information to develop 10 key policy initiatives and strategies needed to advance housing affordability in the region. HAST is available at

<https://housingaffordability.tucsonaz.gov/>.

### **Housing Market Study**

The City of Tucson, Pima County, and the University of Arizona's Economic and Business Research Center partnered to prepare a regional Housing Market Study in 2020. The study aims to help decision makers better understand the existing housing stock and development trends and to identify gaps and potential policies to support a variety of housing options that meet the needs of the full range of household types in our community.

### **Neighborhood Vulnerability in the Tucson Region**

The City of Tucson, Pima County, and the Economic and Business Research Center at the University of Arizona have collaborated to identify "vulnerable", or stressed, neighborhoods within our region by compiling a Neighborhood Vulnerability Index. Vulnerability in this context refers to the differing ability of members of socio-demographic groups to withstand threats to their livelihoods, security, and social, economic, and political networks. The Vulnerability Index may be used for geographically - targeted strategies to direct resources, policies, and programs to best meet the needs of Tucson and Pima County's unique neighborhoods.

### **Commission on Equitable Housing and Development**

The City's Commission on Equitable Housing and Development (CEHD) works in partnership with HCD staff to identify and implement solutions which promote affordability and prevent displacement. The Commission aims to promote social responsibility from both developers and landlords with the City of Tucson in order to assist those in vulnerable housing situations.

## **Program Specific Requirements**

### ***AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)***

#### **Introduction**

Special Notes Regarding HOME Homeownership Value Limits

In order to determine a local median sales value based on current housing market conditions, the City of Tucson and Pima County completed a survey of single-family sales in Pima County following requirements listed at 24 CFR 92.254(a)(2)(iii).

The data for the survey was collected in March 2023 utilizing the most recent data available at

that time, which was January 2023, plus December and November of 2022 in order to determine a local median sales price for single-family homes (one unit only); for both existing homes (resales) and for newly constructed homes (new home sales).

The survey utilized sales data obtained from the Pima County Recorder’s Office, which records all home sales closing escrow in Pima County, and we pulled all the single-family (one unit) sales data for resales and new home sales. New home sales were under 250 per month, requiring a minimum 3-month reporting period according to the regulations at 24 CFR 92.254(a)(2)(iii)(B). The survey for new home sales used data from October 2022, through February 2023, which had 436 sales recorded for the five-month period. The number of resale homes recorded in February 2023 exceeded 500, with 839 sales utilized in the survey for the resale homes.

A summary of the data is provided along with the full data set as an attachment to this plan. The sales are listed in ascending order of sales price following per requirements listed at 24 CFR 92.254(a)(2)(iii)(B). The middle sale numbers and median sales prices are provided below:

Single Family – Resale (3,784 closings, middle sale number = 1,893, median sales price = \$330,000, 95% of median sales price/maximum HOME value limit = \$313,500). Single Family – New Construction (436 closings, middle sale number = 219, median sales price = \$398,498, 95% of median sales price/maximum HOME value limit = \$378,573).

**Special Notes Regarding HOME Beneficiary Eligibility, Application, and Priorities**

A description of the applicant/beneficiary eligibility, application processes, and priorities/limitations on eligibility for HOME activity areas is provided under the Discussion heading at the end of this Section.

**Community Development Block Grant Program (CDBG)  
Reference 24 CFR 91.220(l)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed 0
- 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. 0

3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

There are no other planned forms of investment using HOME program funds.

2. **A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The City of Tucson and Pima County Consortium use resale and recapture methods when funding homebuyer activities. New construction or acquisition/rehabilitation of homeownership housing is subject to resale provisions. When development subsidy is used to write down the purchase price below the fair market value or a unit is developed and/or assisted through a Community Land Trust, the development subsidy converts to direct homebuyer assistance that is subject to resale provisions. Under resale provisions, the original buyer must sell the unit to a HOME eligible buyer at an affordable price that also

allows a fair return on the original buyer investment.

In the consortium program, when direct assistance is provided to a homebuyer and no subsidy is provided to the unit, the entire HOME assistance amount is subject to recapture. The assisted buyer may sell the unit to any willing buyer at a price that the market will bear, with a fair return based upon an objective standard of the publicly available index. The Consortium does not intend to use a presumption of affordability. Fair return requires the assisted homeowner be repaid not less than their initial investment (down payment and closing costs) and investment in eligible improvements, limited to any increase in property value. When net proceeds are insufficient to repay both the homebuyer investment and the HOME assistance, the homebuyer investment is repaid first and any remaining net proceeds are recaptured. The Consortium does not intend to use a presumption of affordability. The City of Tucson/Pima County HOME Consortium administers resale or recapture of HOME funds when used for homebuyer activities in conformity with 92.254 and CPD Notice 12-003.

**3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

Resale provisions are secured by a Deed Restriction, while recapture provisions are secured through a deed of trust and promissory note. Resale and recapture provisions remain in place for a period of 5 to 15 years, depending upon the amount of HOME funds invested.

Resale provisions will be used for homeownership development, including new construction, acquisition/rehabilitation/resale, or units purchased through the Pima County Community Land Trust. If the home subject to resale provisions is sold or no longer occupied as a primary residence during the 5- to 15-year period of affordability, it must be sold to another low-income household. Upon resale, the resale price must provide the original HOME-assisted owner a fair return on investment and ensure the unit is affordable to a reasonable range of low-income homebuyers. Fair return on investment means the original homeowner shall be permitted to recoup their down payment, closing costs, and the value of any major property improvements paid for. Affordable to a reasonable range of low-income homebuyers means that the mortgage payment, including principal, interest, taxes, and insurance will not exceed 30% of a subsequent low-income (less than 80% AMI) buyer's income. Additional HOME funds may be used to provide down payment assistance for a subsequent buyer and the period of affordability extended based on the total amount

of HOME funds invested.

Recapture provisions are used when direct assistance is provided to a homebuyer and no subsidy is provided to the unit. When direct assistance is provided, the entire HOME assistance amount is subject to recapture. The assisted buyer may sell the unit to any willing buyer at a price that the market will bear. When net proceeds are sufficient to repay both the homebuyer investment and the HOME assistance, the HOME assistance is repaid first and any remaining net proceeds are paid to the assisted homebuyers.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

There is no plan to use HOME funds to refinance existing debt secured by multifamily housing projects.

- 5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).**

Not applicable.

- 6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).**

Not applicable.

- 7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).**

The City of Tucson does not impose preferences or limitations for rental housing projects. Potential HOME projects may limit services to populations including older adults and persons with disabilities, provided that such limitations are necessary and supported by

a market study, and adequate supportive services are provided on site to promote positive tenancy and well-being.

### **Emergency Solutions Grant (ESG)**

#### **1. Include written standards for providing ESG assistance (may include as attachment)**

The City of Tucson's ESG Policies and Procedures (Written Standards) are provided as an attachment to this plan. These standards are supplemented by the local Continuum of Care's written standards for ESG and CoC programs which are available for download at <https://tpch.net/about/tpch-governing-documents/>.

#### **2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

The Tucson Pima Collaboration to End Homelessness has Coordinated Entry Policies and Procedures. Coordinated Entry is both a standardized access and assessment model and a coordinated referral and housing placement process. The goal is to ensure that people experiencing homelessness receive appropriate housing assistance and services.

The local Coordinated Entry process uses a "no wrong door" approach with standardized implementation and delivery of assessment and housing problem-solving services from initial engagement to successful housing placement. In summary, the policies and procedures include:

- Trained service providers use the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common assessment unless the assessor believes the depth of the individual's vulnerability warrants a full SPDAT. The local CoC is currently testing and refining a new assessment tool to replace the VI-SPDAT.
- If an individual agrees to participate in the coordinated entry process, they are asked to sign the release of information before proceeding with the assessment. The information is entered into the Homeless Management Information System (HMIS).
- Each housing program serves as the primary point of contact to assist matched individuals/families to locate housing. The navigator works with outreach teams to locate the matched individual/family and help collect any documentation needed for a voucher. Housing navigators are those who currently work for agencies participating in Coordinated Entry.

- An uniform process is used across the community for assessing individuals and families, matching them to an intervention, and within each category, prioritizing placement into housing.
- 3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).**

Both the City of Tucson and Pima County receive an ESG formula grant. To promote consistent standards and avoid duplicate and unnecessary assistance, the City of Tucson and Pima County collaborate in the development of policies and procedures regarding the disbursement of funds and data collection. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

Funds are awarded by the ESG Grantees (City and County) on a competitive basis. A Request for Proposal (RFP) Notice is released through the Continuum of Care as well as through the City Participation Process. Pima County also solicits proposals through public meetings throughout the RFP period. The City of Tucson and Pima County make separate funding awards through allocation committees that review both City and County proposals. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum of Care. Committee members first review and rank proposals individually. Proposals are then reviewed and ranked by the committee, which makes the final funding recommendations.

- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

The City, in its role as the Continuum of Care Lead Agency, actively engages and consults with individuals with lived and living experience of homelessness who serve on the CoC Board, CoC Committees, and funding review panels. In 2023, the CoC established a Lived Experience Council of individuals with lived expertise who provide insight and guidance to CoC and local decision-making.



The City of Tucson Commission on Equitable Housing and Development additionally includes multiple members with lived and/or living experience of homelessness or housing instability.

Both the CoC and Commission on Equitable Housing Development play important roles in the City's processes related to ESG policies and funding decisions.

##### **5. Describe performance standards for evaluating ESG.**

The City of Tucson, Pima County, Arizona Department of Economic Security, and Tucson Pima Collaboration to End Homelessness jointly established ESG performance standards which address:

- Exits to known, safe/stable, and permanent destinations
- Connection to community resources
- Changes in individual/household income
- Receipt of non-cash benefits
- Returns to homelessness
- HMIS data quality and completeness
- Coordinated Entry compliance

##### **Discussion**

**CDBG Certification Period:** The three-year period covered by this Annual Action Plan for CDBG certification is 2023-2025.

**HOME Eligible Applicants, Selection Processes, and Limitations/Preferences:** Eligible HOME applicants and application processes vary by activity area as follows:

**Affordable rental and homeowner housing development activities:** Eligible applicants include not-for-profit and for-profit housing developers. A minimum of 15% of funds are set aside for development activities conducted by Community Housing Development Organizations. The City administers an annual funding competition for affordable rental housing development and, in 2024, conducted a request for proposals process for homeownership development gap financing. In the event of unallocated funds, non-competitive applications may be received and evaluated between annual funding cycles at the City's discretion. Announcements for City HOME affordable housing development activities are posted online at <https://www.tucsonaz.gov/hcd> and through the City of Tucson's various electronic

communication channels, as well as through direct outreach to affordable housing developers working and/or interested in working in the region.

Pima County accepts HOME affordable housing applications through periodic competitive application cycles. Information regarding County HOME affordable housing development activities is posted online at [https://webcms.pima.gov/community/housing/affordable\\_housing\\_development/](https://webcms.pima.gov/community/housing/affordable_housing_development/).

The City of Tucson does not limit or otherwise establish preferences for specific segments of the eligible beneficiary population in its call for projects; however, the City does accept and will award funds as appropriate to individual projects which may limit or establish subpopulation preferences (e.g. housing for older adults, persons experiencing homelessness) provided that such preferences or limitations are permissible by HUD, consistent with Fair Housing requirements, and meet identified community gaps.

**Homeowner Activities (Rehabilitation/Down Payment Assistance):** Applications are accepted on a first-come, first-served basis from eligible low-income homebuyers (below 80% Area Median Income) residing in the geographic service area. Income determination is conducted at execution of the written agreement. Program and eligibility information regarding HOME Down Payment Assistance services is posted online <https://www.tucsonaz.gov/hcd/downpaymentassistance>, communicated through the City and County's various electronic communication channels, through targeted community and media outreach, and by subrecipient housing counseling agencies.

The City of Tucson does not limit or otherwise establish preferences for specific segments of the eligible beneficiary population in its administration of homeownership activities. The City reserves the right to update appropriate policies and procedures, if needed, to permit such preferences or limitations at a future date provided that such preferences or limitations are permissible by HUD, consistent with Fair Housing requirements, and advance community priorities.

**Tenant Based Rental Assistance:** HOME tenant-based rental assistance is provided for individuals and families enrolled in voucher programs administered by the Public Housing Authority and for whom the cost of security deposits will prevent timely entry to affordable housing. TBRA assistance is limited to security deposit assistance for this population and is awarded based upon identification of need by Public Housing Authority personnel administering voucher programs.

**Attachments**

Public Comment Draft