

# Fiscal Year 2027 (Program Year 2026) Tucson/Pima Annual Action Plan

*(July 1, 2026 - June 30, 2027)*

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**PUBLIC COMMENT DRAFT**

*March 2026*



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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. 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, 2025 – June 30, 2030 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) 2026 Annual Action Plan, the City of Tucson expects to receive the following HUD entitlement funds for the period of July 1, 2026 – June 30, 2027:

Community Development Block Grant: \$5,108,670.00

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): \$3,113,944.24 (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): \$445,473.00

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):\$ 1,072,872.00

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.

Notes: The City of Tucson has a current assessment of impediments to fair housing which was completed in 2020. The City additionally complies with consultation requirements related to broadband and resiliency, as further described in the Consultation section of this AAP.

## **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 2025-2030 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
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 2025 are provided in the next section (Evaluation of Past Performance).

\*The City of Tucson/Pima County 2025-2030 Joint Consolidated Plan is available for download at <https://www.tucsonaz.gov/Departments/Housing-and-Community-Development/Documents/Plans>.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects. Will be updated for submission.

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

Please note that this section will be updated and finalized post public comment period

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 11 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 2024. 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 479 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 2026 Annual Action Plan continued citizen participation that informed these plans. The City conducted two public hearings related to the PY 2026 Annual Action Plan. The City conducted one community consultation on March 10, 2026 and two public hearings, one in partnership with Pima County on March 12, 2026 (English language, Spanish language) the other being at Mayor and Council on April 21, 2026. In total, XX individuals representing XX 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 2026 Annual Action Plan was posted on the City of Tucson HCD website for a 30-day public comment period from March 26, 2026- April 26, 2026. Publication of the community consultation public hearings was announced on the City of Tucson website on February 23, 2026, and March 18, 2026, respectively and published in the

Daily Territorial on February 20, 2026. Publication of the public comment period and final public hearing before Mayor & Council was published on the City of Tucson website and in the Daily Territorial on March 19, 2026.

**5. Summary of public comments**

Please note: A summary of public comments received is provided as an attachment to this plan post public comment period

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

Please note: A summary of comments or views not accepted and the reasons for rejection is provided as an attachment to this plan post public comment period

**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 2027 (July 1, 2026-June 30, 2027)

## 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.

Agency Role	Name	Department/Agency
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.

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. In December 2024 the City of Tucson, Pima County, and University of Arizona's Economic and Business Research Center through the MAP Dashboard published a regional housing market study 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. City staff participate on the Pima County Regional Affordable Housing Commission which aims to coordinate a regional approach to meeting the City's and County's housing

needs. HCD supported the City's efforts to pass the Community Corridors Tool code amendment which supports affordable housing development by allowing for increased density on certain infill parcels. The City was the recipient of a Pathways to Removing Obstacles to Housing (PRO Housing) Grant in 2025. This grant will promote and enable the City and County to continue to come up with new and innovative ways to promote the development of affordable housing.

**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 2027 (PY 2026) 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**

**Please note: A table will be included with all public participation and comments post public comment period.**

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

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

Please note: that this section will be updated post public comment period

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 TPCCH 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**

**Please note: this section will be updated post public comment period.**

The goals to be pursued through the PY 2025 Annual Action Plan were established through the Consolidated Planning Process and refined through the creation of the City of Tucson's 2024 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 PY 2026 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. 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**

**Please note: This section will be updated post public comment period.**

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 XX community members attended the public meeting. Refer to the attached summary of comments received.			
2	Public Meeting	Non-English Speaking - Specify other language: Spanish				
3	Public Hearing	Non-targeted/broad community	Public hearing was held before Mayor & Council with XX persons present.			
4	Newspaper Ad	Non-targeted/broad community				

**Table 4 – Citizen Participation Outreach**

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

### Introduction

The City of Tucson anticipates receiving CDBG, ESG, HOME and HOPWA funding over the next five years.

### 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	5,108,670.00	200,000	0.00	5,308,670	15,326,010	Community Development Block Grant (CDBG) funds may be used for a variety of activities that address the needs of low-and-moderate-income residents and communities. Eligible uses of funds include public improvements and services, housing, planning, and administration. All activities 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	3,113,944.24	100,000	0.00	3,223,944.24	9,341,832	HOME Investment Partnership Program (HOME) funds may be used to assist low-and-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.

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	1,072,872.00	0.00	0.00	1,072,872.00	3,218,616	The Housing Opportunities for Persons with AIDS (HOPWA) program funds housing assistance and support services for low-income persons with HIV/AIDS and their families.

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	445,473.00	0.00	0.00	445,473.00	1,336,419	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**

HUD Consolidated Plan resources are leveraged with numerous federal, state, local and private resources to address the needs identified in this plan.

The ESG and HOME programs require local matching funds, which are met as follows:

1. ESG matching funds from allowable costs incurred by sub-grantees, cash donations, and the value of third-party in-kind contributions.
2. HOME matching funds from the City General Fund, project partners, and private resources, including the value of donated labor, third-party in-kind contributions, fee waivers, and below-market interest rate financing. Matching funds are contributed by the City and County proportionate to the amount of HOME funds and are identified on a project-by-project basis.

Federal leverage resources from the US Department of Housing and Urban Development include:

1. Continuum of Care funding for emergency and transitional housing, permanent housing placement, essential services, rapid rehousing (rental assistance), and permanent housing in facilities.
2. Public Housing Capital funds for the development, financing, and modernization of public housing and management improvements.
3. Public Housing Operating funds for administration of public housing.
4. Section 8 Housing Choice Voucher funds for rent subsidies to low-income households in the City of Tucson and Pima County.
5. Veterans Affairs Supportive Housing vouchers for rent subsidies to Veterans experiencing homelessness.
6. Lead-Based Paint Hazard Control Program funds to abate lead in housing occupied by families with children under six years of age residing in or frequenting housing built prior to 1978.
7. Preservation and Reinvestment Initiative for Community Enhancement (PRICE) funding to maintain, protect, and stabilize manufactured housing and manufactured housing communities.
8. Pathways to Removing Obstacles to Housing (PRO Housing) grant funds to identify and remove barriers to affordable housing production and preservation, including updating land use policies, streamlining permitting processes, creating anti-displacement measures, and fostering housing-forward policies and practices that increase housing supply and lower housing costs for low- and moderate-income households.
9. CHOICE Neighborhoods implementation funds to redevelop affordable housing and improve neighborhood conditions

**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 City of Tucson may make available multiple parcels of city-owned land for the development of housing or facilities that serve LMI people and neighborhoods. Land and property may be developed through public-private partnerships using a variety of Consolidated Plan and leverage resources. City-owned land will primarily be used to develop affordable housing, and permanent supportive housing. Rehabilitation is planned for many city-owned properties to provide transitional housing, emergency shelter, and updated affordable housing.

**Discussion**

State leverage resources from the Arizona Departments of Housing and Economic Security include:

1. Low-income Housing Tax Credit financing for developers of affordable rental housing serving households with income below 60% of the area median income, on a competitive basis.
2. Emergency Shelter Grant resources for street outreach, services, emergency/transitional shelter improvements and operating, addition of emergency/transitional housing beds, rapid rehousing (rental assistance), and homelessness prevention.
3. HOME funds for housing development on a competitive basis.
4. National Housing Trust Funds for rental housing serving extremely low-income households, on a competitive basis.
5. State Housing Trust Funds for development and preservation of housing benefiting low-and-moderate income renters and owners.

Local and private leverage and match resources include:

1. General Fund resources for human services, facilities, and infrastructure.
2. Federal Home Loan Bank resources that support savings for homeownership and provide financing for affordable housing development and preservation.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### 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	2025	2029	Non-Housing Community Development	Citywide	Community Sustainability	CDBG: \$2,304,671.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 11000 Persons Assisted
2	Human and public services	2025	2029	Non-Housing Community Development	Citywide	Human and Public Services	CDBG: \$760,531.00	Public service activities other than Low/Moderate Income Housing Benefit: 440000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Decent Affordable Rental and Homeownership Housing	2025	2029	Affordable Housing	Citywide	Decent Affordable Housing	CDBG: \$1,021,734.00 HOME: \$2,802,550.00	Rental units constructed: 6 Household Housing Unit  Homeowner Household Units Constructed: 20 Rental housing units rehabilitated: 30 Homeowner Housing Rehabilitated: 50 Household Housing Unit Direct Financial Assistance to Homebuyers: 12 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 240 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Prevent and Reduce Homelessness	2025	2029	Homeless	Citywide	Homelessness	ESG: \$412,063.00	Public service activities other than Low/Moderate Income Housing Benefit: 195 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted Homeless Person Overnight Shelter: 59 Persons Assisted Homelessness Prevention: 26 Persons Assisted
5	Housing and Services for People with HIV/AIDS	2025	2029	Non-Homeless Special Needs	Citywide	Housing and Services for People with HIV/AIDS	HOPWA: \$1,040,686.00	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 45 Households Assisted Homelessness Prevention: 100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Program Administration	2025	2029	Program Administration	Citywide	Program Administration	CDBG: \$1,021,734.00 HOPWA: \$32,186.00 HOME: \$311,394.00 ESG: \$33,410.00	Other: 1 Other

Table – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Community Facilities and Improvements
	<b>Goal Description</b>	Improvements to community facilities and infrastructure to benefit low-to-moderate income residents and neighborhoods.
2	<b>Goal Name</b>	Human and public services
	<b>Goal Description</b>	Human and public services to benefit low-to-moderate income residents and neighborhoods.
3	<b>Goal Name</b>	Decent Affordable Rental and Homeownership Housing
	<b>Goal Description</b>	Rental and homeownership housing assistance and development.

4	<b>Goal Name</b>	Prevent and Reduce Homelessness
	<b>Goal Description</b>	Activities for individuals and families at risk of or experiencing homelessness.
5	<b>Goal Name</b>	Housing and Services for People with HIV/AIDS
	<b>Goal Description</b>	HOPWA funding to support housing and services for people with HIV/AIDS and their families, including administrative support for project sponsors.
6	<b>Goal Name</b>	Program Administration
	<b>Goal Description</b>	Administration of CDBG, ESG, HOME and HOPWA programs.

Public Comment Draft

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Tucson selects projects by directly identifying community needs, a direct application process for individuals, and through a Call for Projects process approved by the City Mayor and Council.

#### Projects

#	Project Name
1	ESG25 City of Tucson
2	CDBG Human and Public Services
3	CDBG Community Facilities and Improvements
4	CDBG Administration and Planning
5	CDBG Decent Affordable Rental and Homeowner Housing
6	City of Tucson HOME Administration
7	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
8	Pima County HOME Administration
9	Pima County HOME Decent Affordable Rental and Homeowner Housing
11	HOPWA Services for People Living with HIV/AIDS
12	HOPWA Administration

**Table 3 - Project Information**

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

The People, Communities, and Homes Investment Plan, or P-CHIP, established the strategic goals and objectives for Housing and Community Development (HCD) over the next four years. It provided a starting point, direction, and scope, creating a framework for decision-making. Through the P-CHIP distribution of funds, HCD aims to create pathways to opportunity, ensuring that all individuals, regardless of their background or circumstances, experience dignity, belonging, and the ability to thrive.

Obstacles to addressing underserved needs include:

- Lack of affordable housing options.
- Low-income and high poverty rates.
- Increased homelessness due to housing supply and cost.
- Neighborhood differences.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	CDBG Human and Public Services
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Human and public services
	<b>Needs Addressed</b>	Human and Public Services
	<b>Funding</b>	CDBG: \$760,531.00
	<b>Description</b>	Community Food Bank Emergency Food Assistance Program (LMC) Matrix Code 05WCommunity Bridges First Responder Navigation (LMC) Matrix Code 05ZSister Jose Women's Center Impact Project for Especially Vulnerable Women (LMC) Matrix Code 05ZPima County Community and Workforce Development Emergency Eviction and Legal Services-The Craycroft (LMC) Matrix Code 05ZPima Council on Aging Pima Meals on Wheels (LMC) Matrix Code 05AUnited Way of Tucson and Southern Arizona VITA (Volunteer Income Tax Assistance) (LMC) Matrix Code 05ZCity of Tucson Housing First Program City Street Outreach Program (LMC) Matrix Code 05ZZ
	<b>Target Date</b>	6/30/2026

<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>80,000 low-moderate income individuals will benefit from Community Food Bank.</p> <p>225 low-moderate income individuals will benefit from Community Bridges.</p> <p>100 low-moderate income individuals will benefit from Sister Jose Woman's Center.</p> <p>460 low-moderate income individuals will benefit from Pima County Community &amp; Workforce Development.</p> <p>1,500 low-moderate income individuals will benefit from Pima Council on Aging, Inc.</p> <p>7,500 low-moderate income individuals will benefit from United Way of Tucson and Southern Arizona.</p> <p>392 low-moderate income individuals will benefit from City of Tucson Housing First Street Outreach.</p>
<p><b>Location Description</b></p>	<p>The Community Food Bank is located at 3003 S Country Club Rd, Tucson, AZ 85713</p> <p>Community Bridges, Inc. is located at 250 S. Toole Ave, Tucson, AZ 85701</p> <p>Sister Jose Woman's Center is located at 1050 S. Park Ave. Tucson, AZ 85702</p> <p>Pima County Community &amp; Workforce Development is located at 1440 S. Craycroft Rd. Tucson, AZ 85711</p> <p>Pima Council on Aging, Inc. is located at 8467 E. Broadway Blvd. Tucson, AZ 85710</p> <p>United Way of Tucson and Southern Arizona is located at 330 N Commerce Park Loop #200 Tucson, AZ 85745</p> <p>City of Tucson Housing First Program is located at 195 W. Irvington Rd. Tucson, AZ 85714</p>

	<b>Planned Activities</b>	<p>Emergency Food Assistance for Low-moderate income households.</p> <p>Community Housing Outreach and Navigation Services for low-moderate income individuals.</p> <p>Emergency Women Overnight Shelter and Case Management for low-moderate income individuals.</p> <p>Homeless Prevention and Legal Services for low-moderate income households.</p> <p>Emergency mobile food assistance for senior and disabled for low-moderate income households.</p> <p>Tax return preparation and filing for low-moderate income households.</p> <p>Street outreach and homeless navigation services for low-moderate income individuals.</p>
<b>2</b>	<b>Project Name</b>	ESG25 City of Tucson
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Prevent and Reduce Homelessness Program Administration
	<b>Needs Addressed</b>	Homelessness Program Administration
	<b>Funding</b>	ESG: \$445,473.00
	<b>Description</b>	ESG will be used for Street Outreach, Essential Services, Rapid Rehousing, Emergency Shelter, and Program Administration
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	ESG will provide assistance to 675 individuals experiencing homelessness
	<b>Location Description</b>	ESG activities are conducted City wide.
<b>Planned Activities</b>	ESG will be used for Street Outreach (\$29,233.00 -6.6%), Rapid Rehousing (\$77,706.00- 17.4%), Emergency Shelter (\$207,473.00 - 46.6%), Homelessness Prevention (\$97,651.00 - 21.9%), and Program Administration (\$33,410.00 - 7.5%)	
<b>3</b>	<b>Project Name</b>	CDBG Community Facilities and Improvements
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Community Facilities and Improvements	
	<b>Needs Addressed</b>	Community Sustainability	
	<b>Funding</b>	CDBG: \$2,304,671.00	
	<b>Description</b>	Public and community facilities throughout the City of Tucson. Specific activities to be determined.	
	<b>Target Date</b>	6/30/2030	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Activities are to be determined.	
	<b>Location Description</b>	Activities are to be determined.	
	<b>Planned Activities</b>	Activities are to be determined.	
	4	<b>Project Name</b>	CDBG Administration and Planning
		<b>Target Area</b>	Citywide
<b>Goals Supported</b>		Program Administration	
<b>Needs Addressed</b>		Program Administration	
<b>Funding</b>		CDBG: \$1,021,734.00	
<b>Description</b>		These funds will be used to administer all CDBG activities and to support planning initiatives. Matrix codes 21A and 20.	
<b>Target Date</b>		6/30/2026	
<b>Estimate the number and type of families that will benefit from the proposed activities</b>			
<b>Location Description</b>			
<b>Planned Activities</b>		City of Tucson funding for CDBG administration and planning activities.	
5	<b>Project Name</b>	CDBG Decent Affordable Rental and Homeowner Housing	
	<b>Target Area</b>	Citywide	
	<b>Goals Supported</b>	Decent Affordable Rental and Homeownership Housing	
	<b>Needs Addressed</b>	Decent Affordable Housing	
	<b>Funding</b>	CDBG: \$1,021,734.00	

	<b>Description</b>	CDBG-funded homeowner (matrix code 14A) and rental housing development and rehabilitation (matrix code 14B).
	<b>Target Date</b>	6/30/2030
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 50 LMI owners and renters will benefit from the proposed activities.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Rehabilitation of housing occupied by LMI owners (CDBG Matrix Code 14A). Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, and permanent supportive housing (CDBG Matrix Code 14B).
6	<b>Project Name</b>	City of Tucson HOME Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$224,204.00
	<b>Description</b>	Administration of HOME program in fulfillment of HOME activities and requirements.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Administration of HOME program in fulfillment of HOME activities and requirements.
7	<b>Project Name</b>	City of Tucson HOME Decent Affordable Rental and Homeowner Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Decent Affordable Rental and Homeownership Housing

	<b>Needs Addressed</b>	Decent Affordable Housing
	<b>Funding</b>	HOME: \$2,017,836.00
	<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. This project includes \$336,306.00 in CHDO set aside funds.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 32 low-moderate income homebuyers, 6 low-income renters, and 240 very low-income renters will benefit from activities.
	<b>Location Description</b>	Locations to be selected.
	<b>Planned Activities</b>	Construction of affordable rental housing, including permanent supportive housing and transitional housing. Security and utility deposits (TBRA). Downpayment assistance for first time home buyers. Homebuyer unit construction or acquisition and rehabilitation for resale.
8	<b>Project Name</b>	Pima County HOME Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Decent Affordable Rental and Homeownership Housing Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOME: \$87,190.00
	<b>Description</b>	Administration of HOME program in fulfillment of HOME activities and requirements.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	Administration of HOME program in fulfillment of HOME activities and requirements.
<b>9</b>	<b>Project Name</b>	Pima County HOME Decent Affordable Rental and Homeowner Housing
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Decent Affordable Rental and Homeownership Housing
	<b>Needs Addressed</b>	Decent Affordable Housing
	<b>Funding</b>	HOME: \$784,714.00
	<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. This project includes \$ 130,785.60 in CHDO set aside funds.
	<b>Target Date</b>	6/30/2030
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 4 low-moderate income homeowners and 2 very low-income renters will benefit from the proposed activities.
	<b>Location Description</b>	Locations to be determined.
	<b>Planned Activities</b>	Construction of affordable rental housing, including permanent supportive housing and transitional housing. Downpayment assistance for first time home buyers. Mobile home replacement/owner-occupied housing rehabilitation.
<b>10</b>	<b>Project Name</b>	HOPWA Services for People Living with HIV/AIDS
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing and Services for People with HIV/AIDS
	<b>Needs Addressed</b>	Housing and Services for People with HIV/AIDS
	<b>Funding</b>	HOPWA: \$1,040,686.00
	<b>Description</b>	Essential services for LMI persons with HIV/AIDS and their families. Monthly rental assistance and or security/utility deposits. HOPWA Project Sponsor administration.
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 245 people living with HIV/AIDS and their families will benefit from HOPWA housing assistance and supportive services.
	<b>Location Description</b>	Locations confidential.
	<b>Planned Activities</b>	Essential services for LMI persons with HIV/AIDS and their families. Monthly rental assistance and or security/utility deposits. Project Sponsor administration.
<b>11</b>	<b>Project Name</b>	HOPWA Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing and Services for People with HIV/AIDS
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	HOPWA: \$32,186.00
	<b>Description</b>	City of Tucson administration of the HOPWA program.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	City of Tucson HOPWA program administration.

## AP-50 Geographic Distribution – 91.220(f)

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

The City of Tucson will direct funds throughout the City (citywide target area). Funding to geographic areas emphasized in the People, Communities, and Homes Investment Plan (P-CHIP), including THRIVE Zones may be prioritized.

### Geographic Distribution

Target Area	Percentage of Funds

Table 4 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The City of Tucson funds activities throughout the City that benefit low- and moderate-income households and neighborhoods.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The City of Tucson plans to provide affordable housing assistance for approximately 400 households. This includes rapid rehousing and permanent housing for persons experiencing homelessness, tenant-based rental assistance for the homeless, special needs populations and very low-income HCV holders, new construction and rehabilitation of rental and homeownership 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 2026 as they relate to affordable housing:

- Supporting 260 or more households experiencing homelessness (248 households assisted to enter voucher programs through HOME tenant-based rental assistance and 12 households to receive ESG rapid rehousing assistance).
- Supporting 84 or more non-homeless households to maintain stable housing 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: 248 households - HOME tenant-based rental assistance; 45 households - HOPWA tenant-based rental assistance, 12 households - ESG rapid rehousing.
- Production of New Units: 15 rental and homeownership units created through HOME program.
- Rehab of Existing Units: 59 rental and homeownership units rehabilitated through HOME and CDBG programs.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	260
Non-Homeless	84
Special-Needs	45
<b>Total</b>	<b>389</b>

**Table 5 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	305
The Production of New Units	15
Rehab of Existing Units	59
Acquisition of Existing Units	10
<b>Total</b>	<b>389</b>

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

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Tucson Public Housing Program owns and operates 900+ public housing units and an additional 400+ affordable housing units throughout the City of Tucson and Pima County. The PHA provides housing to 2,069 public housing resident families. The information included in this section is from the HCD Annual HUD PHA Plan for 2026. A separate public hearing is held for the PHA Plan.

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

In the coming year, the City of Tucson intends to implement 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 move forward with asset repositioning for two projects based on the ranking of properties within the portfolio to create a pool of properties to reposition. The City of Tucson is moving forward with a Rental Assistance Demonstration Project for an 82-unit multi-family project. In addition, the City of Tucson is implementing a strategy for scattered site properties. That strategy includes phases of dispositioning including selling to a non-profit affiliate, collaborating with non-profit groups, and creating affordable ownership opportunities.

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

During the coming year, the PHA will continue to support PHA resident councils. Resident councils work in collaboration with PHA staff to support public housing operations and resident quality of life.

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 that can be used for down payment and/or closing costs. This savings account may be supplemented with down payment assistance from other homeownership programs.

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

#### **Discussion:**

The Tucson Public Housing Authority is currently designated as troubled. CDBG, ESG, HOPWA, and/or HOME financial assistance provided to the Public Housing Authority, if any, will be subject to routine monitoring and oversight by the Community Development Division to ensure full compliance with federal program requirements. At this time, the Housing Authority receives no direct financial assistance

through HUD entitlement programs; however, Housing Authority participants benefit from security deposit assistance provided through the HOME TBRA program and homelessness prevention assistance through the ESG program.

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

### **Introduction**

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

### **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 Continuum of Care (CoC) will coordinate outreach activities through partnerships between the City of Tucson, Pima County, behavioral health entities, and local nonprofit outreach programs. These efforts have proven effective in reaching out to unsheltered homeless people. Outreach workers are trained to conduct Housing Questionnaire (HQ) screening in the field and use progressive engagement strategies with unsheltered individuals to encourage engagement with shelter, supportive housing, and available housing subsidies and services.

The City's Housing First program, supported by ESG, CoC, and CDBG program funds, conducts targeted outreach in high-concentration encampments to provide person-centered responses to unhoused persons while mitigating the negative impacts of unsheltered homelessness on surrounding neighborhoods.

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

The City of Tucson will utilize ESG funding to support emergency shelter and transitional housing, homelessness prevention, and services for people experiencing homelessness. ESG funding will be leveraged with City funding and the activities of the Continuum of Care.

The City of Tucson owns and administers five emergency shelter/transitional housing facilities which are operated by the City, Pima County, and non-profit partners with a sixth currently under redevelopment. Together these facilities provide more than 300 beds of shelter/transitional housing nightly.

#### **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**

Aftercare and follow-up activities serve families with the aim of quickly identifying and addressing issues that could result in repeat homelessness. To shorten the time that individuals and families experience homelessness, the city will work to strengthen partnerships between workforce and supportive housing systems, accelerate the transition to PHA vouchers or alternate resources as soon as comprehensive case management is no longer needed, aid with early housing planning for people experiencing homelessness, and accelerate receipt of SSI/SSDI benefits when possible. The success of these efforts will however continue to be limited by the shortage of affordable and supportive housing.

**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 may 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.) designed 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. Additionally, families may 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.

**Discussion**

Funds are awarded on a competitive basis. The City of Tucson and Pima County jointly make some funding allocations. 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 a person who is currently experiencing homelessness or formerly experienced homelessness.

**AP-70 HOPWA Goals– 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>

Public Comment Draft

## AP-75 Barriers to affordable housing – 91.220(j)

### Introduction:

Both local and federal public policies on affordable housing and residential investment may increase the cost of housing or cause delays that increase costs. The City of Tucson and Pima County completed the HUD Regulatory Barrier Questionnaire and identified possible barriers.

The City of Tucson identified a need to update its estimates of current and anticipated housing demand, review of the corridor redevelopment code to determine its impact on housing development, and insufficient land zoned to meet the demand for additional housing in Tucson; however, many areas of Tucson cannot accommodate additional density without significant investment in infrastructure improvements, particularly water infrastructure.

Pima County identified multiple factors that require further exploration to determine their potential impact on housing affordability, housing choice, and access to opportunity for a range of households. These factors include assessment of the current and future estimated demand for housing by low-, moderate-, and middle-income households, examination of mechanisms to expand the availability of middle-missing development (duplexes, triplexes, and quadplexes), and smaller-lot single-family housing types, and examining density bonuses as a mechanism to offset the cost of building below market-rate units in development that includes affordable housing.

### **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 has adopted its updated General Plan, Plan Tucson, which was approved by Mayor and Council and ratified by Tucson voters in November 2025. Pima County also adopted its updated Comprehensive Plan, Pima Prospers, in 2025. Together, these plans establish a coordinated regional framework focused on encouraging infill and redevelopment, expanding housing supply, and increasing diversity and affordability of housing options.

Within Plan Tucson, Goal 5: Expand Affordable and Accessible Housing Options provides a clear policy direction to increase public and private investment in housing, promote a wider range of housing types, and improve access to stable and attainable housing for residents of all incomes and abilities.

Complementary policies throughout Goal 5, emphasize transit-oriented development, infrastructure investment to support new housing, and strategies to mitigate displacement.

The City completed a Housing Needs Assessment in late 2024, which identified a significant and ongoing housing shortage. The analysis estimates that Tucson will need to produce over 62,000 housing units by 2045 to meet current and future demand, including approximately 4,700 units to address homelessness, 8,000 units to address existing underproduction, and nearly 50,000 units to accommodate future

population growth. Importantly, the greatest need is concentrated among lower-income households, with approximately 34,000 units needed for households earning 0-60% of Area Median Income. Near-term needs are also substantial, with over 20,000 units needed by 2028 and more than 35,000 units needed by 2033.

The City advanced several key land use and zoning reforms to facilitate housing development in 2025. The Community Corridors Tool (CCT), adopted in March 2025, modifies existing zoning along major corridors to allow more flexible development standards, encouraging mixed-use development, and support higher-density housing aligned with City goals. Additionally, the City adopted a Middle Housing code amendment in December 2025, allowing housing types such as duplexes, triplexes, fourplexes, townhomes, and cottage courts, in most residential zones citywide (excluding rural residential zones). These efforts collectively position the City to address identified housing needs to support infill and redevelopment, enable a broader range of housing types, and align local policies with regional housing demand and long-term growth projections.

In addition to the Comprehensive Plan update, Pima County will 1) examine mechanisms to expand the availability of middle-missing development (duplexes, triplexes, and quadplexes), and smaller-lot single-family housing types, and 2) examine density bonuses as a mechanism to offset the cost of building below market-rate units in development that includes affordable housing, and 3) work with a private sector firm to complete a housing market study, target market analysis, and multi-day visioning charette.

To further encourage affordable housing development, the consortium will:

1. Provide HOME funds to Low-income Housing Tax Credit projects, subject to underwriting and subsidy layering analyses.
2. Provide infrastructure, where practical, in support of affordable housing development.
3. Make HOME funds available for non-LIHTC projects.
4. Invest in neighborhood and community improvements.

**Discussion:**

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

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

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

The People, Communities, and Homes Investment Plan, or P-CHIP, establishes the strategic goals and objectives for Housing and Community Development (HCD). It provides a starting point, direction, and scope, creating a framework for decision-making and addressing obstacles to meeting underserved needs.

At the heart of P-CHIP is creating pathways to opportunity, ensuring that all individuals, regardless of their background or circumstances, experience dignity, belonging, and the ability to thrive. A critical step towards opportunity is providing safe, quality, affordable homes, and essential services that people need to thrive.

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

During the coming year, the City of Tucson will focus on the following housing objectives:

- Preserve, enhance and expand the supply of high-quality affordable rental housing;
- Prioritize building affordable housing and a variety of housing types to meet the various housing needs of Tucsonans;
- Transform city-owned housing;
- Reduce barriers to homeownership through homebuyer assistance, education, and counseling;
- Expand the supply of affordable housing for homeownership;
- Reduce threats to homeownership stability; and
- Reduce and mitigate evictions and foreclosures.
- Expand access to healthy, safe, and sustainable housing
- Reduce housing segregation and its effects
- Target affordable housing investments in areas of opportunity

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

The City of Tucson administers HUD's Lead Hazard Reduction and Healthy Homes Grant provides lead hazard mitigation and other health and safety improvements to properties built before 1978 within the city limits of Tucson that are homeowner/rental occupied by households at 80% AMI or lower with children under age six that live/ frequently visit the home. Qualified applicants receive a free Lead

Inspection and Risk Assessment conducted by a state-certified lead inspector to test for lead inside and outside of the home. Properties that test positive for lead receive lead hazard mitigation services targeting the removal of lead based paint and lead dust, such as replacing windows, doors, and peeling paint; and will also benefit from additional health and safety improvements, such as roof replacement or installing a working HVAC system. The program is administered as a grant to homeowners at no cost and includes free blood testing for children under age six through a community health agency, as well as a partnership with a local nonprofit to raise awareness of the program and the dangers of lead poisoning.

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. The Consortium has licensed contractors available to perform appropriate abatement and/or removal procedures if lead-based paint is present. The Consortium 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 Consortium follows a multi-pronged approach to reduce lead hazards:

1. Section 8 Housing Choice Vouchers. The PHA inspects prospective dwellings constructed prior to 1978 that will be occupied by households that have a child under the age of six 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.
2. Public Education. Lead Hazard Information is distributed to participants in homeownership and rental programs.

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

P-CHIP established core funding priorities through review of guiding plans and existing community priorities, evaluation of data, and community input received through surveys, stakeholder meetings, and other public outreach. Reducing poverty and ensuring dignity for all is one of the P-CHIP funding priorities. By funding activities to reduce poverty, the city will optimize opportunity and enable people living in poverty to perform to the best of their abilities. Actions will focus on:

1. Expanding economic mobility opportunities for low-income populations;
2. Reducing barriers and ensuring access to quality education, work, self-sufficiency, and training opportunities.

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

The City of Tucson and Pima County recognize the benefits of increasing administrative efficiencies to improve the delivery system. During the next year the Consortium members will:

1. Work with program partners to:
  - Increase and coordinate homelessness prevention resources; and
  - Examine approaches to developing additional permanent supportive housing, family shelter and low demand shelter.
1. Examine alternate methods of fair housing outreach and education to reach a broad range of individuals and organizations.
2. Develop resources to reach landlords and encourage participation in tenant-based rental assistance and acceptance of households with unique backgrounds.
3. Examine methods of increasing homelessness outreach in rural areas.

In addition, the City of Tucson will:

1. Expand the use of a new online electronic database system for accepting and reviewing grant applications, active contract management and long-term compliance monitoring.
2. Transition and transform the City's public housing in alignment with objective E.3 on the City's P-CHIP.
3. Coordinate with Constables to connect people with homelessness outreach staff to provide connection to housing and services.
4. Utilize Specialty Vouchers to assist people experiencing or at risk of homelessness, and HOME TBRA funds to provide move-in assistance.
5. Maintain the OPCS Homeless Work program at 5 days a week utilizing General Funds.
6. Invest in professional development, provide ongoing training, and ensure that HCD and community partner staff are equipped with the skills and knowledge necessary to meet community goals.

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

The City and County will continue to work together with public and private housing and social service agencies to build local capacity to address housing, homelessness and community services and development needs. Actions that may allow for co-funding of highly effective projects at significant levels may also be examined. As the collaborative applicant for CoC 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 Section 8 Housing Choice Voucher and public housing

programs for people experiencing homelessness.

**Discussion:**

No further discussion.

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

**Introduction:**

This section describes specific requirements of the Consolidated Plan for the CDBG, HOME and ESG programs.

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

**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 may utilize either the resale or recapture methods when funding homebuyer activities.

- Resale provisions will be utilized for Pima County Community Land Trust units and for any investment in new construction or acquisition/ rehabilitation/ resale of homeownership housing, when the HOME assistance does not reduce the purchase price below fair market value.
- Recapture provisions will be utilized for down-payment and closing cost assistance, and investments in new construction or acquisition/ rehabilitation/ resale when the HOME assistance reduces the purchase price below fair market value.

Recapture provisions are secured through a deed of trust and promissory note. Resale provisions are secured through a resale restriction agreement. Resale and recapture provisions remain in place for a period of 5 to 15 years, depending upon the amount of HOME funds invested as proscribed by the HOME regulations. HUD-approved resale and recapture provisions have not been changed since approval.

The Consortium (PJ) has determined the 95% of the median area purchase price for single family housing following the requirements of the HOME regulation at 92.254 (2) (iii) (A). Data supporting the calculation is included in the appendix. The homeownership value limits are:

- For existing housing - \$304,000
- For new construction housing - \$345,000

**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 may be used for homeowner unit 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, any principal paid on the mortgage, and the value of any 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 may be used when HOME funds are provided in the form of down-payment and closing cost assistance and/or an interest-rate buydown, or are used for homeowner development. If the home is sold or no longer occupied as a primary residence during the 5- to 15-year affordability period, repayment of the HOME funds subject to recapture is required. HOME funds subject to recapture are defined as the sales price, less the first lien (mortgage payoff) and any seller-paid closing costs.

In the event of foreclosure, transfer in lieu of foreclosure, or assignment of an FHA mortgage to clear title, resale or recapture restrictions may be extinguished in accordance with HOME regulations. In these cases, the consortium or a CHDO may exercise a right of first refusal or other means to intervene to preserve affordability of the unit.

**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:**

The refinancing guidelines are included in the Grantee's Unique Appendices.

**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 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 nonsegregated 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.

#### **Emergency Solutions Grant (ESG) Reference 91.220(l)(4)**

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

The Emergency Solutions Grant Policy Manual is attached.

##### **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 Coordinated Entry process is a "no wrong door" approach that uses a standardized process from initial engagement to successful housing placement. In summary, the policies and procedures include:

- Trained service providers use the Housing Questionnaire (HQ) as the community's standardized common assessment tool. The HQ is a locally developed assessment instrument used to evaluate housing needs, vulnerability, and service prioritization for individuals and families experiencing homelessness.
- 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 HMIS.

- Each housing program serves as the primary point of contact to assist a client with navigating their matched housing program. The navigator works with outreach teams to locate the client and help collect any documentation needed for a voucher. Housing navigators are those who currently work for agencies participating in Coordinated Entry.
  - A uniform process is used across the community for assessing individuals, 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).**

The City of Tucson receives 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.

The City of Tucson ESG subaward process is designed to align with the P-CHIP five-year strategic plan. It begins with a call for projects that address the objectives of the P-CHIP plan and a Request for Proposals (RFP), which is published on the Housing and Community Development (HCD) website. To ensure prospective subrecipients understand the application process, a pre-conference kickoff meeting is held, providing guidance on how to apply for ESG funding.

Once the RFP is released, subrecipients submit their applications through Neighborly Software Portal. These applications then undergo a two-tiered review process. The first stage is a threshold review conducted by City of Tucson staff. This initial review ensures that the applications meet ESG funding eligibility criteria and identify curable deficiencies in an application and reach out to the submitting agency to provide corrections or additional information.

Following the threshold review, the applications proceed to the second stage, where they are evaluated by a Community Review Panel. This panel, comprising community representatives, reviews and scores the applications. Once the scoring process is complete, a list of recommended projects is forwarded to the HCD Director for further review. The community panel recommendations are then submitted to the Mayor and Council for final review and adoption.

After the approval process is complete, all applicants are notified of their award status. Subrecipients whose applications are approved proceed to the final stage, where the Human Services Contracts team executes subrecipient agreements.

- 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 jurisdiction meets the homeless participation requirement in 24 CFR 576.405(a).

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

The Tucson Pima Collaboration to End Homelessness ESG Written and Performance Standards provide measures to evaluate the effectiveness of:

1. Targeting resources to those most in need of assistance;
2. Reducing the number of people living on the streets and in emergency shelters;
3. Shortening the time people spend homeless; and
4. Reducing program participants' housing barriers or housing stability risks.

Public Comment Draft