City of Tucson and Pima County

2020 Analysis of Impediments to Fair Housing
Choice Citizen Participation Plan
5-year HUD Consolidated Plan
2020-2021 Action Plan

PUBLIC MEETING
Tuesday March 10, 2020
Review and discuss:

- Analysis of Impediments to Fair Housing Choice
- Citizen Participation Plan
- 5-year Consolidated Plan
- FFY2020 Annual Action Plans
  - City of Tucson
  - Pima County
Analysis of Impediments to Fair Housing Choice
What is the Analysis of Impediments to Fair Housing Choice (AI)?

▪ Document that assesses conditions that affect the location, availability and accessibility of housing and identifies impediments to fair housing choice
  ▪ Actions, omissions or decisions *taken* because of race, color, religion, sex, disability, familial status or national origin that restrict housing choice or the availability of housing choice
  ▪ Actions, omissions or decisions that *have the effect of* restricting housing choice or the availability of housing choice for protected classes

▪ Seven identified impediments
  1. Housing Discrimination
  2. Community Education and Awareness
  3. Geographic Concentrations
  4. Lending Discrimination
  5. Disability Accessibility
  6. Fair Housing Monitoring and Reporting
  7. Enforcement of City of Tucson Fair Housing Ordinance
Impediments and Action Plan

- **Housing Discrimination**
  - Community survey
  - Interviews
  - Focus groups
  - Testing & complaint data
- **Goal**
  - Identify & address through support & awareness
    - Support fair housing testing & enforcement
      - Each Council Ward & Supervisor District
    - Pima County housing search engine listing testing

- **Community Education & Awareness**
  - Community survey
  - Interviews
  - Focus groups
  - Testing & complaint data
- **Goal**
  - Continue & expand education efforts to increase understanding & the likelihood of reporting
    - Fair housing contact information provided to receptionists
    - Celebrate Fair Housing month in April of each year
    - Fair Housing posters, pamphlets, literature and City/County websites
    - Fair Housing training
      - Twice each year
Impediments and Action Plan

- Geographic Concentrations
  - Census tract level socio-economic data
    - 32 minority & poverty concentration
    - 55 Hispanic concentration
- Goal
  - Expand access to housing choice through program policies to alleviate segregated housing patterns
    - Bi-lingual literature
    - Information about areas of high opportunity
    - Engage landlords & property managers in areas of high opportunity
    - Promote affordable housing development outside areas of minority concentration
    - Assess balance of neighborhood improvements with possible displacement
    - Research socio-economic and housing market conditions to determine true extent of neighborhood change
    - Interactive maps publicly available

- Lending Discrimination
  - Home Mortgage Disclosure Act data reveals disproportionately higher rate of loan denial & high cost loans
- Goal
  - Educate borrowers to increase understanding of credit market
    - Market housing counseling opportunities
    - Expand housing education and counseling programs
    - Examine opportunities for portfolio lending
Impediments and Action Plan

• Disability Accessibility
  • Majority of fair housing complaints; frequently related to reasonable accommodation
  • Goal
    • Increase awareness to identify and address housing discrimination based on disability
      • Fund disability accessibility improvements
      • Enforce inclusive design ordinances
      • Incorporate accessibility improvements in rehabilitation projects
      • Education regarding reasonable accommodation
      • Improve access to Fair Housing information by working with organizations that serve people with sight and hearing impairments

• Fair Housing Monitoring & Reporting
  • Information on actions difficult to find
  • Goal
    • Increase available information to support community education & focus fair housing activities
      • Maintain a contact log
      • Summarize and publish fair housing activities
      • Use results of activities to refine methods of affirmatively furthering fair housing

• City of Tucson Fair Housing Ordinance
  • Testing revealed cumbersome process
  • Goal
    • Increase public information
      • Policies & procedures for processing complaints
      • Publicize ordinance & complaint procedure
      • Incorporate information into Fair Housing training
Citizen Participation Plan
5-year Consolidated Plan
FY2020 Action Plan
What is the Consolidated Plan?

- Document that serves as the City and County guiding application for HUD Community Planning and Development resources
  - Establishes 5-year goals and objectives for ± $10.4M annually
  - City of Tucson
    - Community Development Block Grant (CDBG) – FY2020 $5,602,779
    - HOME Investment Partnership Program (HOME) – FY2020 $3,550,066
      - 71% City of Tucson
      - 29% Pima County
    - Housing Opportunities for Persons with AIDS (HOPWA) – FY2020 $750,028
    - Emergency Solutions Grant (ESG) – FY2020 $483,655
  - Pima County
    - Community Development Block Grant (CDBG) – FY2020 $2,971,606
    - Emergency Solutions Grant (ESG) – FY2020 $258,818

- Annual Action Plans
  - Describe how annual allocations of HUD CPD resources will be distributed
  - Planned activities must be tied to 5-year goals and objectives
Leverage Resources

- **Federal**
  - Continuum of Care
  - Public Housing Capital and Operating
  - Section 8 Housing Choice Vouchers
  - Veterans Affairs Supportive Housing vouchers
  - Lead-Based Paint Hazard Control Program
  - FEMA Emergency Services – Pima County
  - Brownfields – Pima County

- **State**
  - Low-income Housing Tax Credits
  - Homelessness prevention funding
  - Emergency Shelter Grant (ADES)
  - HOME and National Housing Trust Funds, on a competitive basis.

- **Local and private**
  - General Fund Human Services
  - Federal Home Loan Bank resources
  - Private equity and financing
  - Community Health services
  - Employment and Job Training

Leverage resources are not included in Consolidated Plan funding or goals.
Five Elements

1. Consultation & Citizen Participation
2. Needs Assessment
   - Housing
   - Homelessness
   - Special populations
   - Non-housing community development
3. Housing Market Analysis
   - Cost and condition of housing
   - Homeless & special populations facilities
   - Non-housing community development assets
4. Strategic Plan
   1. Priority needs
      - Based on consultation, needs assessment and housing market analysis
   2. Goals for the use of anticipated HUD CPD funding
   3. Strategies to address:
      - Housing, homelessness, special populations, non-housing community development, poverty
5. First-year Action Plan
   - Annual Goals & Objectives
   - Program specific requirements
Consultation & Citizen Participation

- Driven by Citizen Participation Plan
  - 5-year Consolidated Plan
    - One public meeting
    - One public hearing during public comment period
    - 30-day public comment period
  - Annual Action Plan
    - One public hearing during public comment period
    - 30-day public comment period
  - Consolidated Annual Performance Report
    - 15-day public comment period
  - Definition of substantial amendment
    - Change in method of distribution that alters distribution of funds by 20% or more of annual allocation
    - Change in project funding greater than 15% of CDBG or HOME allocation
    - Funding an activity not in the Annual Action Plan
    - Changing priorities in the 5-year Plan
    - Receipt of additional funds part of the 5-year Plan

- This Consolidated Plan & Annual Action Plan
  - Nine Community Forums
    - 110 attendees
  - Two Follow-up Meetings
  - Online Survey
    - 798 resident responses
  - Today’s Meeting
  - Public Comment Period
    - March 20, 2020 – April 21, 2020
  - Public Hearings
    - April 21, 2020
      - City of Tucson Council
      - Pima County Board of Supervisors

- Nine Community Forums
  - 110 attendees
Citizen & Stakeholder Priorities

- Affordable Housing
  - Rental
  - Owner-occupied housing rehabilitation
- Homelessness
  - Permanent supportive housing
  - Prevention
  - Low-barrier shelter
- Special Populations
  - Seniors, youth and people with disabilities
- Economic Development
  - Small business assistance
  - Employment, job training, job search/employment services
- Facilities, Infrastructure, & Public Services
  - Health/mental health clinics and services
  - Public safety
  - Broadband infrastructure
  - Child care centers and services
  - Libraries & other community facilities
  - Transportation & transit
  - Fair Housing
  - Financial education & counseling
- Capacity Building
  - Leadership development
  - Collaboration with health care/mental health care sectors
Needs Assessment

- Households (7%) growing faster than population (4%)
  - More single and 2-person households
- 162,360 LMI Households Countywide
  - 31,335 annual income less than $10,000
  - 46,163 annual income $10,000-$20,000
- 104,950 LMI Households in Tucson
  - 22,037 annual income less than $10,000
  - 31,761 annual income $10,000-$20,000
- Chronic homelessness \(\uparrow 17\%\)
  - Statewide trend \(\uparrow 27\%\)
  - SMI & Chronic Substance Abuse
  - Inter-related with affordable rental housing & lower-wage employment
    - Landlord/property manager relationships

- Vulnerable Populations
  - 58,000 LMI Elderly/Frail Elderly
  - Increasing HIV/AIDS incidence
  - 81,750 households include a person with disabilities
  - 52,000 SMI and 98,800 substance abuse disorder in 2017 (SAMSHA)
  - 15,000 DV calls in 2017
  - 18.3% poverty rate in 2017
    - No HS Diploma, people with disabilities, single mothers with children < age 5
  - 28,238 families on Section 8 HCV and Public Housing waiting lists

- Non-housing Community Development
  - Past uses of funds, stakeholder input, citizen priorities, capital improvements/economic development plans
Housing Market Analysis

Median Home Values 2015-2017
• Pima County ↑ 23.1% to $196,600
• Tucson ↑ 29.4% to $169,900
• Income ↑ 5.4%

Median Rents 2015-2017
• Pima County ↑ 5% to $719/month
• Tucson ↑ 5% to $676/month
• 12% between 2009 and 2017
Owner Housing Problems

- 37% of LMI Households Own
  - Many are older householders
- Severe Cost Burden Most Common Housing Problem
  - 20,000 LMI Owners
    - 8,300 Extremely Low-income
    - 6,300 Low-income
    - 5,400 Moderate-income
- Cost Burden Also Common
  - 16,300 LMI Owners
    - 1,900 Extremely Low-income
    - 4,500 Low-income
    - 9,900 Moderate-income
Renter Housing Problems

- 63% of LMI Households Rent
- Severe Cost Burden Most Common Housing Problem
  - 34,300 LMI Renters
    - 21,100 Extremely Low-income
    - 10,750 Low-income
    - 2,500 Moderate-income
- Cost Burden Also Common
  - 24,300 LMI Renters
    - 2,000 Extremely Low-income
    - 10,100 Low-income
    - 12,200 Moderate Income
Rental Unit Need

- 17,369 units needed for *severely cost burdened* renters
  - 11,835 with rent less than $250 for HH with income < $10,000
    - 9,309 in Tucson
  - 5,534 with rent $250-$500 for HH with income $10,000 to $19,999
    - 4,700 in Tucson

- 7,288 units with no cash rent (3,944 in Tucson)
  - Not included in Analysis

- State & City Data
  - 1,426 affordable units with expiring affordability 2020-2025
Priority Needs

Tucson
1. Community Sustainability
2. Human & Public Services
3. Decent Affordable Housing
4. Homelessness
5. Economic Development
6. Housing & Services for Persons with HIV/AIDS
7. Program Administration

Pima County
1. Community Facilities & Improvements
2. Public Services
3. Decent Affordable Housing
4. Homelessness
5. Economic Development
6. Program Administration
Tucson CDBG 5-yr Planned Funding & Goals

- Rental housing rehabilitation, $7,009,032, 25%
- Non-housing facilities/improvements, $6,150,000, 22%
- Housing rehabilitation, $1,500,000, 5%
- Demolition & clearance, $1,050,000, 4%
- Human services, $4,202,084, 15%
- Administration, $5,602,779, 20%
- Business assistance, $500,000, 2%
- Homeowner housing rehabilitation, $2,000,000, 7%

FFY2020 (CY2021)

- Rental Housing Acquisition/Rehabilitation ($1.4M)
  - 25 units
- Non-Housing Community Facilities & Improvements ($1.2M)
  - 10,000 people
  - 40% in target area
- Human & Public Services ($840,400)
  - 1,500 people
- Owner Housing Rehabilitation ($400,000)
  - 100 units
- Housing Facilities & Improvements ($300,000)
  - 20 households
- Demolition & Clearance ($210,000)
  - 6 buildings
- Façade Improvements ($100,000)
  - 5 businesses
Consortium Funding & Numeric Goals - HOME

FFY 2020 (CY2021) - $3,550,066
- Tucson 71% ($2,517,707) / Pima County 29% ($1,032,359)
- CHDO set-aside 15% ($532,510)
  - Renter & owner development activities
    - Program Administration 10% ($355,007)
- Rental Housing
  - Tucson- 80% ($2,005,936) & Pima Co-59% ($605,123)
    - Acquisition and/or Rehabilitation
      - Tucson 10 / Pima County 2 units
    - New Construction
      - Tucson 15 / Pima County 5 units
    - Tenant-based Rental Assistance
      - Tucson 60  / Pima Co 5 households
- Owner Housing
  - Tucson- 20% ($260,000) & Pima Co- 41% ($324,000)
    - First-time Homebuyer Assistance
      - Tucson 25 / Pima Co 15 households
    - Development
      - Tucson 5 / Pima County 5 units
    - Substantial Owner Housing Rehabilitation
      - Pima County 1 unit
Tucson Funding & Numeric Goals – HOPWA & ESG

5-year Plan

• HOPWA
  • Program Administration 3% ($112,500)
  • Remaining funds administered by SAAF
    • Program Administration 7%
    • Housing assistance - 1,000 households
    • Tenant-based rental assistance – 200 households
    • Support services – 1,000 households

• ESG
  • Program Administration 7.5% ($181,371)
  • Competitive process for remaining funds
    • Prevention – 100 households
    • Outreach & services – 500 people
    • Rapid Rehousing – 500 households
    • Operating support – 1,000 people

FFY2020 (CY2021)

• HOPWA
  • Program Administration 3% ($22,500)
  • Remaining funds administered by SAAF
    • Program Administration 7%
    • Housing assistance - 200 households
    • Tenant-based rental assistance – 40 households
    • Support services – 200 households

• ESG
  • Program Administration 7.5% ($36,274)
  • Competitive process for remaining funds
    • Prevention – 25 households
    • Outreach & services – 100 people
    • Rapid Rehousing – 100 households
    • Operating support – 250 people
Pima County Funding & Numeric Goals - CDBG

**FFY2020**
- Non-Housing Community Facilities & Improvements 36% ($1.08M)
  - 100,000 people
  - 24 Community Development Target Areas
- Owner Housing Rehabilitation 24% ($700,000)
  - 90 owner housing units
- Program Administration 20% ($594,321)
- Public Services 15% ($440,000)
  - 20,000 people
- Economic Development 2% ($50,000)
  - Façade improvements, debt service reserve, nonprofit organization capacity building
  - 2 business
  - 10 jobs
- Housing Facilities & Improvements 1% ($40,000)
  - 25 households
- Demolition & Clearance 1% ($40,000)
  - 6 buildings
- Code Enforcement 1% ($30,000)
  - 25 housing units

Pima County 5-yr CDBG Planned Funding & Goals

- Business assistance, $250,000, 2%
- Homeowner housing rehabilitation, $3,500,000, 24%
- Public services, $2,200,000, 15%
- Code enforcement, $150,000, 1%
- Clearance & demolition, $200,000, 1%
- Non-housing facilities/infrastructure, $5,386,424, 36%
- Program Administration, $2,971,606, 20%
- Housing facilities/infrastructure, $200,000, 1%
Pima County Funding & Numeric Goals – ESG

5-year Plan

- Program Administration 7.5% ($97,057)
- Competitive process for remaining funds
  - Prevention – 200 households
  - Outreach & services – 400 people
  - Rapid Rehousing – 40 households
  - Operating support – 1,000 people

FFY2020 (CY2021)

- Program Administration 7.5% ($19,411)
- Competitive process for remaining funds
  - Prevention – 40 households
  - Outreach & services – 80 people
  - Rapid Rehousing – 8 households
  - Operating support – 200 people
• Public comment period March 20, 2020 – April 21, 2020
  • Submit written comments to:
    • Glenn Moyer, City of Tucson
      • [Glenn.Moyer@tucsonaz.gov](mailto:Glenn.Moyer@tucsonaz.gov)
    • Joel Gastelum, Pima County
      • [Joel.Gastelum@pima.gov](mailto:Joel.Gastelum@pima.gov)
      • Mailing addresses in public notice

• Public Hearings
  • April 21, 2020

• Submit 5-year Consolidated Plan and FY2020 Action Plan to HUD
  • By May 15, 2020