

Congress of the United States
Washington, DC 20515

May 28, 2021

The Honorable Marcia Fudge
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, DC 20410

Dear Secretary Fudge:

We write to respectfully urge you to consider changes to the eligibility and scoring guidelines in this year's Choice Neighborhoods (CN) Implementation Grant Notice of Funding Availability (NOFA). We strongly believe that a target housing site that focuses on low-income older adults and persons with disabilities should be eligible and competitive for implementation grant funding.

The City of Tucson was proud to receive a \$1.3 million Choice Neighborhoods Planning and Action Grant for the Oracle Road / Miracle Mile area in 2018, with a specific focus on the Tucson House as the target housing site. Since that time, the City has engaged residents, neighborhoods, businesses, and cross-sector stakeholders in a robust, community-oriented planning process to develop a shared vision and Transformation Plan for the area. The City has also leveraged the CN Planning grant with several ongoing efforts including other federal grants to create a collaborative, community-centered coalition to drive and sustain change in a distressed area of Tucson. The "Thrive in the 05" collaborative is a leading example in Tucson of a comprehensive, collective impact model of neighborhood change that centers the voices of residents and addresses the Housing, People, and Neighborhood goals of the CN program.

Tucson House is a 17-story, 408-unit public housing apartment complex that was built in 1963 as a luxury "city within a city" complex with large floor plans, on-site amenities, and sweeping view of Tucson's mountains and downtown. Since becoming public housing in the 1980s, Tucson House has primarily been home to low-income older and disabled adults.

Since Tucson received the CN Planning grant in 2018, HUD changed the CNI eligibility criteria for target housing sites, excluding sites dedicated to elderly and disabled residents. In addition, the current scoring criteria excludes points for programs and outcomes that benefit elderly and disabled residents. However, through the CN planning process, Tucson has identified a profound need for housing that is affordable and meets the specific needs of older adults and those with disabilities. A market analysis of the target area found that residents aged 65 or older were the fastest growing of all age groups over the past decade, increasing by 43.6 percent between 2010 and 2020. Residents between 55 and 65, meanwhile, registered a 23.9 percent growth rate over the same time period. The vision articulated by residents during CN planning points towards a

new “city within a city” at Tucson House with health and wellness amenities that enable residents to age in place in the context of a larger, vibrant, multi-generational neighborhood.

We believe this vision matches the overarching goals of the CN program. Tucson is not alone as a PHA struggling to provide quality housing in mixed neighborhoods with targeted services to older and disabled residents. I believe the holistic approach that the CN program takes to address neighborhood change can and should support decent and affordable housing for these vulnerable population groups.

Provided is a list of suggested changes for the Notice of Funding Availability we urge you to consider that we have attached to this letter. We appreciate your consideration of this important request.

Sincerely,



Raúl M. Grijalva
Member of Congress



Ann Kirkpatrick
Member of Congress



Tom O'Halleran
Member of Congress

Enclosure: HUD NOFA Proposed Amendments