

August 14, 2019

**Five- Year Consolidated Plan for CDBG Program
Years 2019/2020 - 2023/2024**

**Annual Action plan for CDBG Program
Year 2019/2020**

For Submission to the U.S. Department of Housing & Urban Development



Table of Contents

Executive Summary	1
ES-05 Executive Summary.....	1
The Process	7
PR-05 Lead & Responsible Agencies.....	7
PR-10 Consultation	8
PR-15 Citizen Participation.....	12
Needs Assessment.....	16
NA-05 Overview	16
NA-10 Housing Needs Assessment.....	19
NA-15 Disproportionately Greater Need: Housing Problems.....	31
NA-20 Disproportionately Greater Need: Severe Housing Problems.....	36
NA-25 Disproportionately Greater Need: Housing Cost Burdens	41
NA-30 Disproportionately Greater Need: Discussion.....	43
NA-35 Public Housing	46
Section 504 Needs Assessment.....	51
NA-40 Homeless Needs Assessment	52
NA-45 Non-Homeless Special Needs Assessment.....	57
NA-50 Non-Housing Community Development Needs	62
Housing Market Analysis	65
MA-05 Overview.....	65
MA-10 Number of Housing Units – 91.210(a) & (b)(2).....	67
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)	70
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)	74
MA-25 Public and Assisted Housing – 91.210(b).....	77
MA-30 Homeless Facilities and Services – 91.210(c).....	79
MA-35 Special Needs Facilities and Services – 91.210(d).....	82
MA-40 Barriers to Affordable Housing – 91.210(e).....	83
MA-45 Non-Housing Community Development Assets – 91.215 (f)	84
MA-50 Needs and Market Analysis Discussion	93

Strategic Plan	96
SP-05 Overview	96
SP-10 Geographic Priorities	98
SP-25 Priority Needs	100
SP-30 Influence of Market Conditions	102
SP-35 Anticipated Resources.....	103
SP-40 Institutional Delivery Structure	105
SP-45 Goals Summary.....	109
SP-50 Public Housing Accessibility and Involvement.....	110
SP-55 Barriers to affordable housing.....	110
SP-60 Homelessness Strategy	111
SP-65 Lead based paint Hazards.....	113
SP-70 Anti-Poverty Strategy.....	114
SP-80 Monitoring.....	116
Action Plan.....	118
AP-15 Expected Resources.....	118
AP-20 Annual Goals and Objectives	121
AP-35 Projects – 91.220(d).....	123
AP-38 Project Summary	125
AP-50 Geographic Distribution – 91.220(f).....	126
AP-55 Affordable Housing – 91.220(g)	127
AP-60 Public Housing – 91.220(h)	128
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	129
AP-75 Barriers to affordable housing – 91.220(j).....	131
AP-85 Other Actions – 91.220(k).....	132
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)	134
Appendix.....	136
1. Maps	
2. Certifications and SF 424.....	
3. Public Participation Summaries.....	
4. Public Notices	

5. Citizen Participation Plan	
-------------------------------------	--

Tables

Table 1 – Responsible Agencies	7
Table 2 – Agencies, Groups, Organizations Who Participated.....	10
Table 3(A) – Other Local / Regional / Federal Planning Efforts	11
Table 3(B) - Other Consultations & Coordination.....	11
Table 4 – Citizen Participation Outreach	13
Table 5 – 2019 HUD Income Limits	17
Table 6 – Housing Needs Assessment Demographics	20
Table 7 – Total Households Table	21
Table 8 – Housing Problems Table	24
Table 9 – Housing Problems 2.....	25
Table 10 – Cost Burden > 30%	26
Table 11 – Cost Burden > 50%	27
Table 12 – Crowding Information 1/2	28
Table 13 – Crowding Information 2/2	29
Table 14 – Disproportionally Greater Need 0 - 30% AMI	32
Table 15 – Disproportionally Greater Need 30 - 50% AMI	33
Table 16 – Disproportionally Greater Need 50 - 80% AMI	34
Table 17 – Disproportionally Greater Need 80 - 100% AMI	35
Table 18 – Severe Housing Problems 0 - 30% AMI.....	37
Table 19 – Severe Housing Problems 30 - 50% AMI.....	38
Table 20 – Severe Housing Problems 50 - 80% AMI.....	39
Table 21 – Severe Housing Problems 80 - 100% AMI.....	40
Table 22 – Greater Need: Housing Cost Burdens AMI	42
Table 23 – Public Housing by Program Type.....	48
Table 24 – Characteristics of Public Housing Residents by Program Type	49
Table 25 – Race of Public Housing Residents by Program Type.....	50
Table 26 – Ethnicity of Public Housing Residents by Program Type	51
Table 27(A) – Homeless Needs Assessment	53
Table 27(B) - Homelessness by Racial and Ethnic Group.....	55

Table 28 – Residential Properties by Unit Number	67
Table 29 – Unit Size by Tenure	68
Table 30 – Cost of Housing	70
Table 31 – Rent Paid	70
Table 32 – Housing Affordability	71
Table 33 – Monthly Rent	72
Table 34 – Condition of Units.....	74
Table 35 – Year Unit Built	75
Table 36 – Risk of Lead-Based Paint	76
Table 37 - Vacant Units.....	76
Table 38 – Total Number of Units by Program Type	78
Table 39 – Public Housing Condition	78
Table 40 – Facilities and Housing Targeted to Homeless Households	80
Table 41 – Business Activity	85
Table 42 – Labor Force	86
Table 43 – Occupations by Sector	87
Table 44 – Travel Time.....	87
Table 45 – Educational Attainment by Employment Status	88
Table 46 – Educational Attainment by Age.....	89
Table 47 – Median Earnings in the Past 12 Months	89
Table 48 – Concentrations of Households with Housing Problems	93
Table 49 – Geographic Priority Areas	99
Table 50 – Priority Needs Summary	101
Table 51 – Influence of Market Conditions.....	102
Table 52 – Anticipated Resources	103
Table 53 – Institutional Delivery Structure	106
Table 54 – Homeless Prevention Services Summary.....	107
Table 55 – Goals Summary Information	109
Table 56 – Anticipated Resources	119
Table 57(A) – One Year Goals Summary	121
Table 57(B) - Goal Descriptions.....	122

Table 58 - Project Information	124
Table 59: Project Summary Information	125
Table 60 - Geographic Distribution	126
Table 61 - One Year Goals for Affordable Housing by Support Requirement	127
Table 62 - One Year Goals for Affordable Housing by Support Type	127
Table 63 - Available Program Income.....	135
Table 64 - Other CDBG Requirements	135

Maps

Map 1 – CDBG Eligible Areas.....	18
----------------------------------	----

ES-05 Executive Summary

INTRODUCTION

The City of Douglas, Arizona, has completed the planning process for the 2019/2020-2023/2024 Five-Year Consolidated Plan (Consolidated Plan) as required by the U.S. Department of Housing and Urban Development (HUD). The purpose of the Consolidated Plan is to identify goals, objectives and strategies for addressing housing and community development needs, including those of the homeless and special needs populations. The Consolidated Plan guides the use of City resources to address these needs over a five-year period. In previous five program years, the City received an average annual allocation of approximately \$168,426 in Community Development Block Grant (CDBG) funds. This amount totaled \$842,131 over the previous five-years.

The Consolidated Plan is developed in a manner specified by HUD, and the City has followed the prescribed format in completing the plan. The Consolidated Plan was developed using HUD and U.S. Census data for demographics and housing, input from neighborhood meetings and stakeholder interviews, surveys, and past program performance. During the planning process, the City conducted public meetings with multiple City Departments, and with the City Council. The purpose of this process was to receive citizen input on the current housing and community development needs of the City.

There are four major areas of focus in the Consolidated Plan: Housing, Homelessness, Non-Housing Community Development and Non- Homeless Special Needs. The Consolidated Plan process requires the City to identify priority needs for each area and prepare an Annual Action Plan to address the priorities. For every priority, there are goals and objectives established to measure progress. The citizen input was critical in developing the goals and objectives of this Consolidated Plan.

This Consolidated Plan not only presents goals to address the priority needs of the City, but also to address the statutory goals established by Federal law:

Decent Housing:

- Assist homeless persons to obtain affordable housing
- Assist persons at risk of becoming homeless
- Retain affordable housing stock
- Increase the availability of affordable housing in standard condition to low- and moderate-income families, particularly to economically disadvantaged persons (and without discrimination on the basis of race, creed, religion, color, age, sex, marital status, familial status, national origin, disability, gender identity or sexual orientation)
- Increase the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence
- Provide affordable housing that is accessible to job opportunities.

A Suitable Living Environment:

- Improve the safety and livability of neighborhoods Increase access to quality public and private facilities and services

Expanded Economic Opportunities:

- Job creation and retention for low-income persons
- Availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices
- Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing

SUMMARY OF THE OBJECTIVES AND OUTCOMES IDENTIFIED IN THE PLAN NEEDS ASSESSMENT OVERVIEW

Public Facility and Infrastructure Needs

The Public Facility and Infrastructure Needs is focused on streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, utility lines, and aesthetic amenities on public property such as trees, sculptures, pools of water and fountains, and other works of art. The regulations specify that facilities that are designed for use in providing shelter for persons having special needs are considered to be public facilities (and not permanent housing), and thus are covered under this category of basic eligibility. Such shelters would include nursing homes, convalescent homes, hospitals, shelters for victims of domestic violence, shelters and transitional facilities/housing for the homeless, halfway houses for run-away children, drug offenders or parolees, group homes for the developmentally disabled, and shelters for disaster victims. Based on input and data received through the public involvement process, the highest priorities identified by the public and the City are:

- Public Facility and Infrastructure Improvements
- Public Facility improvements and upgrades
- ADA accessibility to public facilities and amenities
- Park Improvements
- Economic Development

Considering these priorities, the following goals and objectives have recommended:

Goal: Public Facility and Infrastructure Improvements

Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure.

Provision of Needed Services

Provision of Needed Services is a broad category that applies to public service-oriented needs for any population that is presumed to be low- and moderate-income and in need of public services. The category covers a large population, including the mentally ill, developmentally disabled, elderly, and

other groups. These specific services are often provided by non-profit agencies, usually in coordination with the City of Douglas or Cochise County.

Based on input and the data received through an extensive public involvement process, the highest priorities identified by the public are:

- Homeless Services and Prevention
- Health and Public Service programs for the elderly
- Fair Housing
- Needed services for low- and moderate-income households

Considering these priorities, the following draft goals and objectives are recommended:

Goal: Provision of Needed Services

Provide needed services for low- and moderate-income (LMI) and special needs populations assumed to be LMI.

EVALUATION OF PAST PERFORMANCE

The previous five years have shown progress in the City of Douglas's efforts to implement HUD entitlement programs. The City complies with HUD regulations and continues to attempt to deliver housing and community development services in an efficient manner.

The Housing Department is a City agency which works to improve the quality of life for City residents by administering housing-related programs and striving to provide decent and safe affordable housing and infrastructure. The Housing Department oversees implementing the CDBG program.

The Housing Department, along with non-profit partners, offers an array of housing programs and services providing the foundation needed to aid in promoting homeownership and/or sustainable neighborhoods:

- Section 8 Housing Choice Voucher Program
- Housing Quality Standards
- Educational information about rent and decent housing

- Family Self-Sufficiency Program

Additionally, the City has funded Public Works activities through the CDBG program.

In the future, funds may be used to implement programs to improve public facilities and infrastructure, ensure access for the mobility-impaired by addressing physical access barriers to public facilities, and support efforts to ensure that adequate access is provided to programs that serve a majority low-income population and those with special needs.

SUMMARY OF CITIZEN PARTICIPATION PROCESS AND CONSULTATION PROCESS

Comments and concerns raised during the citizen participation process were taken into consideration when developing the Consolidated Plan's goals, objectives and strategies. The Consolidated Plan is a collaborative process that involves interviews with stakeholders and meetings with the public to determine areas of need. As part of this process, the City sought to identify the priority needs and strategies to address those needs. Priority needs were identified based on available housing data, public input, stakeholder and internal department meetings, and past program performance. In addition, the City consulted with the Douglas Dispatch, multiple City Departments, and community stakeholders to identify priority needs and develop corresponding strategies.

SUMMARY OF PUBLIC COMMENTS

Based on input and data received through the citizen participation process and internal department meetings, there is a common interest in improving public infrastructure and facilities. Potential needed improvements may include:

- Fairly distributed public facility and infrastructure improvements (streets, neighborhoods)
- Street repaving/resurfacing
- Athletic or sport-focused public facilities improvements (i.e. the aquatic center)
- Sidewalk improvements
- Increased ADA accessibility for public facilities

SUMMARY OF COMMENTS OR VIEWS NOT ACCEPTED AND THE REASONS FOR NOT ACCEPTING THEM

Not Applicable.



PR-05 Lead & Responsible Agencies

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.

TABLE 1: RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
Lead Agency	CITY OF DOUGLAS	Housing Department

Table 1 – Responsible Agencies

NARRATIVE

The City of Douglas, AZ is the lead agency responsible for overseeing the development of the Five-Year Consolidated Plan and Annual Action Plan. The Housing Department is the internal department that is responsible for the day-to-day administration of CDBG funding.

The development of the Consolidated Plan and Annual Action Plan was based on the previous Consolidated Plan and several other studies, plans and reports that have been prepared in recent years.

To maximize citizen participation, staff along with a consultant (Wade Trim Associates) conducted outreach through a series of public notices, hearings, and meetings. As part of these efforts, low- and moderate-income residents, as well as service providers, were encouraged to provide input on the Consolidated Plan and Annual Action Plan.

CONSOLIDATED PLAN PUBLIC CONTACT INFORMATION

Inquiries, comments or complaints concerning the Consolidated Plan, any amendments, or performance reports, can be conveyed by contacting City staff at:

Ms. Xenia Gonzalez, Housing Manager

City of Douglas PHA

425 East 10th Street

Douglas, Arizona 85607

Telephone: (520) 417-7385

Fax: (520) 417-7158

Xenia.gonzalez@douglasaz.gov

Business hours: 8:00 a.m. – 5:00 p.m., Monday through Friday

Inquiries, comments or complaints on the programs may also be offered at the public hearings. Written responses to all written complaints may also be made to the Phoenix Office of the U.S. Department of Housing and Urban Development (HUD) at the following address:

U.S. Department of Housing and Urban Development

Community Planning and Development Division

One North Central Avenue, Suite 600

Phoenix, Arizona 85004

Phone: (602) 379-7100

Fax: (602) 379-3985

TTY: (602) 379-7181

PR-10 Consultation

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

Institutional coordination of the Consolidated Plan establishes a unified vision for community development. The City uses a collaborative process to shape various programs into effective, coordinated strategies. This process also facilitates the opportunity for planning and citizen participation to take place in a comprehensive context, attempting to reduce duplication of effort at the local level.

The City will execute this Consolidated Plan in harmony with public, private and nonprofit agencies where necessary. Nonprofit agencies may include, but are not limited to, service providers and community housing development organizations. Private sector partners may include, but are not limited to, local financial institutions, developers and local businesses. The City works closely with its partners to design programs that address identified needs.

Table 2 outlines the types of agencies and organizations consulted throughout the program year and during the development of the City of Douglas Consolidated Plan and Annual Action Plan. Organizations consulted included the City of Douglas Finance Department, the Public Works Department, the Leisure Services Department, the Economic Development Department, the Information Technology Department, Douglas Public Library, the City Manager’s office, the Housing Department, Cochise County Health and Social Services, American Youth Soccer Organization, and Douglas Dispatch, among others.

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 City has not participated in Continuum of Care activities or programs and due to limited resources has not funded any activities. The City has limited direct experience with not-for-profit community service providers and housing providers. Continued efforts will be made to build contacts and relationships with local, county and regional entities to support and implement CDBG programs.

The City will provide notice to agencies for the purposes of gathering input through meetings and other public input mechanisms.

DESCRIBE CONSULTATION WITH THE CONTINUUM(S) OF CARE THAT SERVES THE JURISDICTION'S AREA IN DETERMINING HOW TO ALLOCATE ESG FUNDS, DEVELOP PERFORMANCE STANDARDS AND EVALUATE OUTCOMES, AND DEVELOP FUNDING, POLICIES AND PROCEDURES FOR THE ADMINISTRATION OF HMIS.

The City of Douglas does not receive or administer an Emergency Shelter Grant (ESG).

TABLE 2: AGENCIES, GROUPS, ORGANIZATIONS AND OTHERS WHO PARTICIPATED IN THE PROCESS AND CONSULTATIONS

Agency/Group/ Organization	Agency/Group/ Organization	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
City of Douglas City manager’s Office	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Finance Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Public Works Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Public Library	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
Cochise County	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
American Youth Soccer Organization	Youth Sports Organization	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Economic Development Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Leisure Services Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Housing Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities
City of Douglas Information Technology Department	Government Agency	Needs Assessment, Market Analysis, Strategic Plan	Public meeting – obtained ideas about needs and priorities

Table 2 – Agencies, Groups, Organizations Who Participated

IDENTIFY ANY AGENCY TYPES NOT CONSULTED AND PROVIDE RATIONALE FOR NOT CONSULTING

Not applicable.

DESCRIBE COOPERATION AND COORDINATION WITH OTHER PUBLIC ENTITIES, INCLUDING THE STATE AND ANY ADJACENT UNITS OF GENERAL LOCAL GOVERNMENT, IN THE IMPLEMENTATION OF THE CONSOLIDATED PLAN (91.215(L))

The City continues to work to build relationships to actively partner with local non-profit community agencies.

Many of the programs and activities that will be carried out by the City during the next five (5) years will involve coordination with several agencies and city departments. To gather more feedback in the creation of this plan, the City reached out to several realtors, developers, housing providers, government entities, educational organizations, family services organizations, youth-oriented organizations, religious groups and media groups. No response was received from many of these organizations, and as a result some, but not all, of those agencies are listed in **Table 3(B)**, along with a description of the type of coordination that will take place.

TABLE 3(A): OTHER LOCAL/REGIONAL/STATE/FEDERAL PLANNING EFFORTS CONSIDERED WHEN PREPARING THE PLAN

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Douglas Downtown Douglas Revitalization	City of Douglas	Public Facility and Infrastructure Improvements; Economic Development
City of Douglas Façade Improvement Grant Program	City of Douglas	Public Facility and Infrastructure Improvements; Economic Development
City of Douglas Housing Authority Section 8 Housing Program 2019 Administrative Plan	City of Douglas PHA	Coordinate efforts to improve affordable housing and fair housing for HCV recipients
City of Douglas General Plan	City of Douglas	Public Facility and Infrastructure Improvements; Economic Development

Table 3(A) – Other local / regional / federal planning efforts

TABLE 3(B): OTHER CONSULTATIONS & COORDINATION

Organization/Agency	Coordination
City of Douglas Parks and Recreation Department	Collaborate with City planned projects (e.g. public facilities improvements)

Table 3(B) – Other Consultations & Coordination

PR-15 Citizen Participation

SUMMARY OF CITIZEN PARTICIPATION PROCESS/EFFORTS MADE TO BROADEN CITIZEN PARTICIPATION

HUD requires local jurisdictions to provide for citizen participation, which encourages the development of the Consolidated Plan in cooperation with residents from every walk of life. In particular, HUD believes it is important to obtain the views of residents who live in CDBG Eligible Areas, as well as service providers who deliver services to low-income and special needs residents.

The following section describes the public participation process that was completed for the City of Douglas, AZ 2019/2020-2023/2024 Consolidated Plan. A summary of the public participation process is shown in **Table 4**.

TABLE 4: CITIZEN PARTICIPATION OUTREACH

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
CDBG Public Hearing #1	Non-Targeted/Broad Community	June 26, 2019; 8 attendees	City staff presented highest priority needs: Infrastructure/public improvements; public facilities; provision of services and/or needs. No negative comments were received. All persons in attendance were in agreement with the highest priority needs the City has designated.	All comments addressed by Strategic Plan.	
CDBG Public Hearing #2	Non-Targeted/Broad Community	July 3, 2019	City staff presented highest priority needs: Infrastructure/public improvements; public facilities; provision of services and/or needs. No negative comments were received. Also, staff presented proposed use of funds. Senior services, park improvements, sidewalks, and community center were expressed as a need.	All comments addressed by Strategic Plan.	
30-Day Public Comment	Non-Targeted/Broad Community	July 12, 2019 – August 12, 2019	No Comments Received	N/A	
Adoption Hearing #3	Non-Targeted/Broad Community	August 14, 2019	Plan Adopted by City Council	N/A	

Table 4 – Citizen Participation Outreach

PUBLIC HEARINGS

CDBG Public Hearing #1

On June 26, 2019 the City conducted a Public Hearing at the City Hall Council Chambers at 425 E 10th Street, Douglas, Arizona 85607. The minutes for this meeting can be seen in the appendix of this plan.

The purpose of this hearing was to inform the public of the Consolidated Plan progress and to present the Draft Goals and Objectives along with the proposed 2019 Annual Action Plan budget. Through internal department meetings, there is a shared interest in prioritizing the improvements of public infrastructure and public facilities, such as sidewalk improvements, increased ADA accessibility, and street repaving/resurfacing. No negative comments were received during this meeting; all parties agreed with the priorities outlined.

CDBG Public Hearing #2

On July 3, 2019 the City conducted a Public Hearing at the City Hall Council Chambers at 425 E 10th Street, Douglas, Arizona 85607. The minutes for this meeting can be seen in the appendix of this plan.

The purpose of this hearing was to inform the public of the Consolidated Plan progress and to discuss proposed use of funds for the first year (FY2019) to those in attendance. Through internal department meetings, there is a shared interest in prioritizing the improvements of public infrastructure and public facilities, such as sidewalk improvements, increased ADA accessibility, and street repaving/resurfacing. No negative comments were received during this meeting; all parties agreed with the priorities outlined.

SUMMARIZE CITIZEN PARTICIPATION PROCESS AND HOW IT IMPACTED GOAL-SETTING

Comments received during the citizen participation process were taken into consideration when developing the Consolidated Plan's priorities, goals, and strategies. Priority needs were identified based on available population, demographic, socioeconomic, housing, and market data; public input received during public hearings; and past program performance. In addition, the City consulted with various City Departments to identify priority needs and develop corresponding strategies. Complete summaries of the meetings are included in the Appendix to this document.

Public Facility and Infrastructure Strategy

Public Facility and Infrastructure strategies were determined through community meetings, meetings with staff and departments, and review of current planning activities. In particular, the City has adopted several Plans that outline community development efforts within the City of Douglas. The City is working to leverage planning efforts with funding opportunities where possible.

Provision of Needed Services Strategy

Provision of Needed Services were determined through meetings with service providers, City staff, and HUD data. HUD and the Census provide data on low income and special needs populations. In addition, there are service providers that are knowledgeable about special needs populations and were able to provide valuable information.

NA-05 Overview

NEEDS ASSESSMENT OVERVIEW

The Consolidated Plan Needs Assessment is a look at the City of Douglas's community-wide needs for housing and community development. The Comprehensive Housing Affordability Strategy (CHAS) 2000 Data Book (data accessed June 2019), along with U.S. Census and American Community Survey data, was used to complete much of the Needs Assessment section of the Consolidated Plan. Consultation with the local Public Housing Authority Plan and other City documents were also considered.

The Needs Assessment section of the Consolidated Plan evaluates the City's current needs for assistance for the following income groups based on Area Median Income (AMI):

- Extremely Low Income (0-30% AMI)
- Very Low Income (30-50% AMI)
- Low Income (50-80% AMI)

AMI is based on the 2019 HUD Income Limits Documentation System which became effective on April 24, 2019. The HUD 2019 income limits for Cochise County are outlined in **Table 5**.

Table 5: 2019 HUD Income Limits

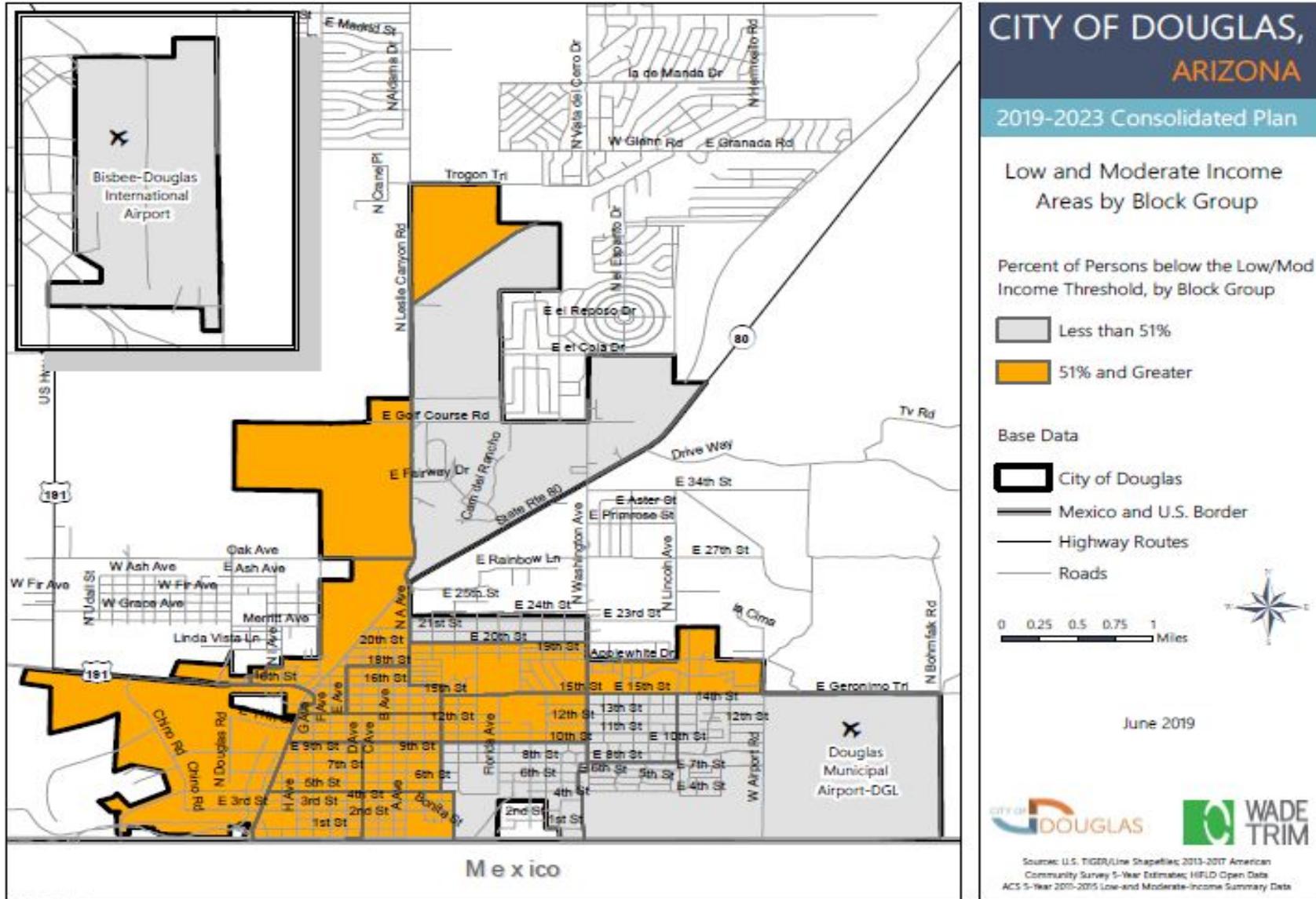
FY 2019 Income Limit Area	Median Income	FY 2019 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Cochise County	\$54,100	Extremely Low (30%) Income Limits	\$12,490	\$16,910	\$21,330	\$25,750	\$30,000	\$32,200	\$34,450	\$36,650
		Very Low (50%) Income Limits	\$19,450	\$22,200	\$25,000	\$27,750	\$30,000	\$32,200	\$34,450	\$36,650
		Low (80%) Income Limits	\$31,100	\$35,550	\$40,000	\$44,400	\$48,000	\$51,550	\$55,100	\$58,650

Effective April 24, 2019

Table 5 – 2019 HUD Income Limits

Map 1 shows the Census block groups where 51 percent or more of the population is within the low- and moderate-income limit categories. Most of the geographic area of the City of Douglas falls within these categories. In general, the low- and moderate-income block groups are located along the western edges of the City, and in the central portions of the City.

Map 1 – CDBG Eligible Areas



NA-10 Housing Needs Assessment

SUMMARY OF HOUSING NEEDS

The Consolidated Plan Housing Needs Assessment is a look at the City of Douglas's needs for housing assistance throughout the community. The data provides an estimated number and type of families in need of housing assistance by income levels, tenure type, household type, and by housing problem (costs burdened, severely cost burdened, substandard housing, overcrowding, or geographic concentration of racial/ethnic groups). This section also integrates needs determined from consultation and public outreach. It includes the following sections:

1. Summary of Housing Needs
2. Demographics
3. Number of Households
4. Housing Problems 1
5. Housing Problems 2
6. Costs Burden >30%
7. Costs Burden >50%
8. Crowding Table (More than One Person Per Room)
9. Additional Housing Needs Narrative

This section of the Consolidated Plan details the characteristics of the City of Douglas's households and housing stock.

Demographics

Table 6 displays the population, number of households, median income for the base year and most recent year and calculates the percentage of change. This data indicates an overall population decrease from 17,378 in the year 2009 to 16,576 in the 2013-2017 American Community Survey (ACS), a 16 percent increase in population.

In addition, the number of households decreased by 1,856 households from 5,278 to 3,285. This reveals a 37.7 percent decrease in the number of households in the City of Douglas.

Table 6 also identifies an increase in the median income within the City of Douglas. The median income increased \$1,728 (5.9 percent) from \$29,258 to \$30,986.

TABLE 6: HOUSING NEEDS ASSESSMENT DEMOGRAPHICS

	Base Year 2009	Most Recent Years 2013-2017 ACS	Percent Change
Population	17,378	16,576	-4.6%
Households	5,278	3,285	-37.7%
Median Income	\$29,258	\$30,986	5.9%

Source: 2005-2009 ACS (Base Year), 2013-2017 ACS (Most Recent Year)

Table 6 – Housing Needs Assessment Demographics

NUMBER OF HOUSEHOLDS AND TYPES

Table 7 provides the number and type of households by HUD Adjusted Median Family Income (HAMFI). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

The largest number of households is in the greater than 100% HAMFI group with 855 households. The second largest group is the greater than 0-30% HAMFI group (820), followed by the 50-80% HAMFI group (710). This means that approximately 49 percent of all households in the City of Douglas are between 30% and 100% of HAMFI. There are just over a quarter percent of households that are greater than 100% HAMFI and just under a quarter percent of households that are within the 0-30% HAMFI.

Small family households are households that have a family with two to four members. The largest number of small family households reside in the >100% HAMFI group (445), and the second largest group is the 0-30% HAMFI group (375). The remaining income groups have a smaller number of small family households at 190, 240, and 140 for 30%-50%, 50%-80%, and 80%-100%, respectively.

Large family households are households with families with five or more members. The largest number of large family households reside in the 50-80% HAMFI group (185). The income group 0-30% is the second highest group (125), followed by the greater than 100% income group (120), the 80-100% income group (65), and finally the 30-50% income group (50).

Table 7 also provides data on households that contain at least one person considered to be elderly. The data suggests that among income groups, the largest number is within the higher income households that are >100% HAMFI (265). The data also shows that there is a relatively balanced distribution of households containing a person over the age of 75. Households between 30-50% HAMFI contain the largest number of households (130) with a person 75 years or older.

Finally, data provided in **Table 7** illustrates the number of households with one or more children 6 years of age or younger. Among the household income groups identified, the largest number of children 6 years of age or younger reside in homes between 0-30% HAMFI (278). The second largest number of households with children 6 years old or younger is within the 50-80% HAMFI group (189).

TABLE 7: TOTAL HOUSEHOLDS TABLE

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	820	585	710	315	855
Small Family Households	375	190	240	140	445
Large Family Households	125	50	185	65	120
Household contains at least one-person 62-74 years of age	204	145	240	55	265
Household contains at least one-person age 75 or older	80	130	80	60	50
Households with one or more children 6 years old or younger	278	129	189	53	87

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

Table 7 – Total Households Table

HOUSING NEEDS SUMMARY TABLES FOR SEVERAL TYPES OF HOUSING PROBLEMS

Housing Problems 1

Table 8 displays the number of households with housing problems by tenure and HUD Adjusted Median Family Income (HAMFI) according to the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities

- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30 percent of income

As shown in **Table 8**, among the “housing problem” categories, households within the City of Douglas are most commonly impacted by severe housing cost burden (greater than 30 percent of income) and housing cost burden (greater than 50 percent of income).

The first housing problem, substandard housing, is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. **Table 8** identifies 30 renter households who live in substandard housing and 40 owner households.

The second housing problem identified is households living in overcrowded conditions. There are two forms of overcrowding defined by HUD and identified in **Table 8**:

1. Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
2. Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms

As shown in **Table 8**, 180 renter households are experiencing some form of overcrowding, and 59 owner occupied households are experiencing some form of overcrowding.

The final housing problem identified is cost burden. Cost burden is a fraction of a household’s total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

- Severe housing cost burden greater than 50 percent of income

- Housing cost burden greater than 30 percent of income

As shown in **Table 8**, regardless of renter or owner tenure, households within the 0-30% AMI group are experiencing higher rates of housing cost burden (greater than 30 percent of income) and severe housing cost burden (greater than 50 percent of income) than those households with higher incomes. Two-hundred and forty-five renters and 85 owners are experiencing a severe housing cost burden greater than 50 percent of income. The households experiencing housing cost burden greater than 30 percent of income is distributed slightly more evenly between income levels for owners. For renters, the largest number of households experiencing housing cost burden greater than 30 percent of income is within the 0-30% AMI group (105 households). The largest number of households experiencing housing cost burden greater than 30 percent of income for owners is within the 50-80% AMI group (110 households).

Overall, 425 households in the City of Douglas are experiencing a cost burden greater than 50% of income and 525 households experiencing a cost burden greater than 30% of income. There are a total of 950 households experiencing some type of cost burden, accounting for approximately 30% of all households within the City.

TABLE 8: HOUSING PROBLEMS TABLE (HOUSEHOLDS WITH ONE OF THE LISTED NEEDS)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	10	20	0	0	30	15	0	10	15	40
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	20	10	0	0	30	0	0	15	0	15
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	75	30	45	0	150	4	25	15	0	44
Housing cost burden greater than 50% of income (and none of the above problems)	245	70	0	0	315	85	25	0	0	110
Housing cost burden greater than 30% of income (and none of the above problems)	105	90	65	0	260	70	75	110	10	265
Zero/negative Income (and none of the above problems)	25	0	0	0	25	45	0	0	0	45

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

Table 8 – Housing Problems Table

Housing Problems 2

Table 9 displays the number of households with no housing problems, one or more housing problems, and negative income by tenure and HUD Adjusted Median Family Income (HAMFI). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data reveals in **Table 9**, renters in the 0-30% AMI group experience the highest rate of one or more of housing problems identified. A total of 355 renter households below 30% AMI experience some

form of housing problem. Among owner households, the 0-30% AMI group has the highest number of households (105) with one or more of housing problems.

Additionally, a large number of households (70) within the 0-30% AMI group has reported being a household with negative income but has none of the other four identified housing problems.

TABLE 9: HOUSING PROBLEMS 2 (HOUSEHOLDS WITH ONE OR MORE SEVERE HOUSING PROBLEMS: LACKS KITCHEN OR COMPLETE PLUMBING, SEVERE OVERCROWDING, SEVERE COST BURDEN)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	355	130	45	0	530	105	50	40	15	210
Having none of four housing problems	155	150	165	105	575	135	255	460	195	1,045
Household has negative income, but none of the other housing problems	25	0	0	0	25	45	0	0	0	45

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

Table 9 – Housing Problems 2

Cost Burden > 30% and > 50%

Tables 10 and 11 display the number of households with housing cost burdens greater than 30% of income and greater than 50% of income, respectively, by household type, tenure, and household income (expressed as a percentage of Area Median Income (AMI)). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

Households are broken into four categories:

1. Small related – Family households with two to four related members
2. Large related – Family households with five or more related members

3. Elderly – A household whose head, spouse, or sole member is a person who is at least 62 years of age
4. Other – All other households

As shown in **Table 10**, the renter category most experiencing cost burdens greater than 30% of incomes are households defined as Small related. Approximately 315 of the Small related households have a cost burden greater than 30% of income. The owner category most experiencing cost burdens greater than 30% of incomes are Elderly households (162). Additionally, for renters, the category with the second highest number of households experiencing a cost burden of greater than 30% is the Elderly group at 171 households. Among owners, the Small Related group has the second highest number of households that have a cost burden greater than 30% with 129 households.

For renter and owner households, the 0-30% AMI Income group has the highest number of households with a cost burden greater than 30% of income, with 453 and 166 households, respectively.

TABLE 10: COST BURDEN > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	220	70	25	315	65	4	60	129
Large Related	105	15	0	120	4	20	15	39
Elderly	74	52	45	171	78	59	25	162
Other	54	50	0	104	19	19	4	42
Total need by income	453	187	70	710	166	102	104	372

Source: HUD IDIS Output, June 2019; 2011-2015 CHAS

Table 10 – Cost Burden > 30%

As shown in **Table 11**, the renter category most commonly experiencing severe cost burden greater than 50% of income are households in the Small Related group. Approximately 165 of the Small Related households experience a cost burden greater than 50% of income. The owner category most experiencing cost burdens greater than 50% of incomes are Elderly households (58). Additionally, for renters, the category defined as “Other” has the second highest number of households that have a cost burden greater than 50% with 75 renter households, while the Small Related category has the second highest number of households experiencing a cost burden of greater than 50% among owners (34).

For renter and owner households, the 0-30% AMI Income group has the highest number of households with a cost burden greater than 50% of income with a total of 378 households.

TABLE 11: COST BURDEN > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	135	30	0	165	30	4	0	34
Large Related	60	0	0	60	4	10	0	14
Elderly	40	8	0	48	44	14	0	58
Other	50	25	0	75	15	4	0	19
Total need by income	285	63	0	348	93	31	0	125

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

Table 11 – Cost Burden > 50%

Crowding

Table 12 displays the number of households that are overcrowded, defined as households with more than one person per room, excluding bathrooms, porches, foyers, halls, or half-rooms. The data is displayed by household type, tenancy, and household income (expressed as a percentage of Area Median Income (AMI)). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As shown in **Table 12**, overcrowding is an issue that is unevenly distributed between household types. Single family households are the group most affected by crowding. Approximately 150 renter-occupied single-family owner households, and 30 owner-occupied single-family experience overcrowding in the City of Douglas.

Renters with an income of >80-100% AMI have the least number of crowded households at 0 households. Among owners, issues with overcrowding do not occur among incomes of >80-100% AMI.

TABLE 12: CROWDING INFORMATION (MORE THAN ONE PERSON PER ROOM)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	100	25	25	0	150	0	15	15	0	30
Multiple, unrelated family households	0	15	20	0	35	4	10	15	0	29
Other, non-family households	4	0	0	0	4	0	0	0	0	0
Total need by income	104	40	45	0	189	4	25	30	0	59

Source: HUD IDIS Output, June 2019; 2011-2015 CHAS

Table 12 – Crowding Information 1/2

TABLE 13: CROWDING INFORMATION (2/2)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Households with Children Present	49	19	21	0	89	2	12	14	0	28

Source: 2011-2015 CHAS (Number of Households); 2013-2017 ACS; estimates are based on the percentage of households with children under 18 years (47.3%) and those percentages are applied to the total need by income in Table 12: Crowding Information 1/1.

Table 13 – Crowding Information 2/2

WHAT ARE THE MOST COMMON HOUSING PROBLEMS?

The most common housing problem in the City of Douglas is cost burden, for both renter and owner households. Overcrowding (1.01-1.5 people per room) is another prevalent housing problem, but it has a significantly worse impact for renters in the City of Douglas. Substandard housing is also a housing problem; however, it is not as significant when compared to the prevalence of other housing problems, such as cost burden and overcrowding. Severely overcrowded housing (>1.51 people per room) affects both renters and owners, but on a much smaller scale than the other potential housing problems.

ARE ANY POPULATIONS/HOUSEHOLD TYPES MORE AFFECTED THAN OTHERS BY THESE PROBLEMS?

Households earning less than 80% AMI experience higher rates of cost burden, overcrowding, and other housing issues than those households with higher incomes. More renters are experiencing cost burden than owners, especially those earning less than 30% AMI. Comparisons of cost burden by type of household show that while large related renter and owner households are less affected by cost burden, small related, elderly and other household types are more affected. Overcrowded housing is more common among renters; however, substandard housing more commonly affects owners. Single family households are more affected by crowding than households with multiple, unrelated members or other non-family households.

DESCRIBE THE CHARACTERISTICS AND NEEDS OF LOW-INCOME INDIVIDUALS AND FAMILIES WITH CHILDREN (ESPECIALLY EXTREMELY LOW-INCOME) WHO ARE CURRENTLY HOUSED BUT ARE AT IMMINENT RISK OF EITHER RESIDING IN SHELTERS OR BECOMING UNSHELTERED 91.205(C)/91.305(C)). ALSO DISCUSS THE NEEDS OF FORMERLY HOMELESS FAMILIES AND INDIVIDUALS WHO ARE RECEIVING RAPID RE-HOUSING ASSISTANCE AND ARE NEARING THE TERMINATION OF THAT ASSISTANCE

Low-income households at imminent risk of homelessness often have recently lost a job, seen their hours cut if still working, or have encountered a medical emergency, the effect of which is to cause them to spend any savings they might have and reduce or eliminate income. Such households may not have any support from friends or family, who may be in the same economic situation. Lacking education or skills, or facing medical situations or lack of transportation, these persons cannot readily obtain new, better paying positions.

Households facing the termination of re-housing assistance are in a similar situation. In order to obtain a stable housing situation, they need full-time employment, affordable childcare, affordable housing, and transportation. Access to healthcare, life skills training, and additional education and/or training are valuable, if not necessary, in most situations.

IF A JURISDICTION PROVIDES ESTIMATES OF THE AT-RISK POPULATION(S), IT SHOULD ALSO INCLUDE A DESCRIPTION OF THE OPERATIONAL DEFINITION OF THE AT-RISK GROUP AND THE METHODOLOGY USED TO GENERATE THE ESTIMATES.

Not applicable.

SPECIFY PARTICULAR HOUSING CHARACTERISTICS THAT HAVE BEEN LINKED WITH INSTABILITY AND AN INCREASED RISK OF HOMELESSNESS.

Lack of affordable housing, especially among extremely low- and very low-income renters, is the principal risk linked to housing instability in Douglas. However, poor housing maintenance can result in housing violations or findings of inhabitable living conditions among rental properties can force renters into homelessness. The issue of code violations and habitability standards can affect homeowners as well, especially the elderly who do not have the resources to maintain their homes. Lack of accessibility features can force both homeowners and renters out of their living situations.

NA-15 Disproportionately Greater Need: Housing Problems

INTRODUCTION

A disproportionately greater need exists when the members of a racial or ethnic group at a specified income level experience housing problem at a greater rate (10 percentage points or more) than the income level as a whole. For example, assume that 60 percent of all low-income households within a jurisdiction have a housing problem and 70 percent of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified. Although the purpose of these tables is to analyze the relative level of need for each race and ethnic category, the data also provide information for the jurisdiction as a whole that can be useful in describing overall need.

Again, as defined by HUD, housing problems include:

- Substandard housing lacking complete plumbing facilities
- Substandard housing lacking complete kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room, excluding bathrooms, porches, foyers, halls, or half-rooms
- Households with housing cost burden greater than 30% of income

The Disproportionately Greater Needs: Housing Problems section covers the following:

1. Introduction
2. Disproportionately Greater Need—Housing Problems 0-30% Area Median Income (AMI)
3. Disproportionately Greater Need—Housing Problems 30-50% AMI
4. Disproportionately Greater Need—Housing Problems 50-80% AMI
5. Disproportionately Greater Need—Housing Problems 80-100% AMI
6. Discussion

This section has four tables that capture the number of housing problems by income, race, and ethnicity. Each table provides data for a different income level (0-30%, 30-50%, 50-80%, and 80-100% AMI). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

0% - 30% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 0-30% AMI category have the highest number of households with one or more of four housing problems (635 households) and the highest rate (77.4 percent). As shown in **Table 14**, when considering race and ethnicity, Hispanic households have the highest number of households with housing problems at 600 (81.2 percent of all Hispanic households earning 0-30% AMI) and White households have the second highest number with 35 households (89.7 percent of all White households earning 0-30% AMI). It should be noted that within the 0-30% AMI group that all other ethnic groups are not experiencing a high rate of housing problems due to no population.

TABLE 14: DISPROPORTIONALLY GREATER NEED 0 - 30% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	635	77.4%	115	14.0%	70	8.5%	820
White	35	89.7%	4	10.3%	0	0.0%	39
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	0	0.0%	0	0.0%	0	0.0%	0
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	600	81.2%	110	14.8%	29	4.0%	739

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 14 – Disproportionally Greater Need 0 - 30% AMI

30% - 50% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 30-50% AMI category have the second highest number of households with one or more of four housing problems (340 households), and the second highest rate (58.1 percent). As shown in **Table 15**, when considering race and ethnicity, Hispanic households have the highest number of households (295) with housing problems and White households have the second highest number (30). In terms of percentage, White households have the

lowest rates (55.6 percent) of households experiencing housing problems when compared to all other ethnic groups. The Asian household group has 100.0% of its four households experiencing one or more of the four housing problems. The ethnic groups of Black/African American, American Indian/Alaska Native, and Pacific Islander do not experience one or more of the four housing problems due to no population.

TABLE 15: DISPROPORTIONALLY GREATER NEED 30 - 50% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	340	58.1%	245	41.9%	0	0.0%	585
White	30	55.6%	24	44.4%	0	0.0%	54
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	4	100.0%	0	0.0%	0	0.0%	4
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	295	57.3%	220	42.7%	0	0.0%	515

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 15 – Disproportionally Greater Need 30 - 50% AMI

50% - 80% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 50-80% AMI category have the third highest number of households with one or more of four housing problems (260 households), and the third highest rate (36.9 percent). As shown in **Table 16**, when considering race and ethnicity, Hispanic households have the highest number of households (230) experiencing one or more of the four housing problems. Fifty percent of Asian households are experiencing one or more of the four housing problems, while only 15.1 percent of White households are experiencing these problems. American Indian/Alaska Native, Black/ African American, and Pacific Islander do not have any households within this income group.

TABLE 16: DISPROPORTIONALLY GREATER NEED 50 - 80% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	260	36.9%	445	63.1%	0	0.0%	705
White	8	15.1%	45	84.9%	0	0.0%	53
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	20	50.0%	20	50.0%	0	0.0%	40
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	230	37.4%	385	62.6%	0	0.0%	615

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 16 – Disproportionally Greater Need 50 - 80% AMI

80% - 100% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 80-100% AMI category have the lowest number of households with one or more of four housing problems (25 households) and the lowest rate (9.0 percent). As shown in **Table 17**, when considering race and ethnicity, Hispanic households have the highest number of households (25) with housing problems and American Indian/Alaska Native households have the second highest number of households (4) with housing problems. There is no population within this income group for the other ethnicity categories.

TABLE 17: DISPROPORTIONALLY GREATER NEED 80 - 100% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	29	9.0%	290	91.0%	0	0.00%	319
White	0	0.0%	50	100.0%	0	0.00%	50
Black / African American	0	0.0%	0	0.0%	0	0.00%	0
Asian	0	0.0%	0	0.0%	0	0.00%	0
American Indian, Alaska Native	4	100.0%	0	0.0%	0	0.00%	4
Pacific Islander	0	0.0%	0	0.0%	0	0.00%	0
Hispanic	25	9.6%	235	90.4%	0	0.00%	260

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Table 17 – Disproportionally Greater Need 80 - 100% AMI

DISCUSSION

Of all households in the 0%-30% AMI category, 77.4% have one or more of four housing problems. In terms of disproportionate need, the White racial group (89.7%) have a rate that is 10 percentage points higher than the household rate as a whole.

Of all households in the 30%-50% AMI category, 58.1% have one or more of four housing problems. Asian racial or ethnic groups experience a disproportionate need (100.0%).

Of all households in the 50%-80% AMI category, 36.9% have one or more of four housing problems. In terms of disproportionate need, the Asian (50%) racial or ethnic group have rates that are 10 percentage points higher than the household rate as a whole.

Of all households in the 80%-100% AMI category, 9.0% have one or more of four housing problems. In terms of disproportionate need, the American Indian/Alaska Native (100.0%) racial or ethnic group have rates that are 10 percentage points higher than the household rate as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems

INTRODUCTION

As noted in the previous section, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified.

Severe housing problems include:

- Severely overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls, or half-rooms
- Households with severe cost burden of more than 50 percent of income

This section includes:

1. Introduction
2. Disproportionately Greater Need—Severe Housing Problems 0-30% AMI
3. Disproportionately Greater Need—Severe Housing Problems 30-50% AMI
4. Disproportionately Greater Need—Severe Housing Problems 50-80% AMI
5. Disproportionately Greater Need—Severe Housing Problems 80-100% AMI
6. Discussion

This section has four tables that capture the number of severe housing problems by income, race, and ethnicity. Each table provides data for a different income level (0-30%, 30-50%, 50-80%, and 80-100%

AMI). The data source is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

0% - 30% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 0%-30% AMI category have the highest number of households experiencing severe housing problems (460 households). As shown in **Table 18**, when considering race, Hispanic households have the highest number of households with severe housing problems at 440 and White households are second with 14 households.

TABLE 18: SEVERE HOUSING PROBLEMS 0 - 30% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	460	56.1%	290	35.4%	70	8.5%	820
White	14	41.2%	20	58.8%	0	0.0%	34
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	0	0.0%	0	0.0%	40	100.0%	40
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	440	59.5%	270	36.5%	29	4.0%	739

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS Data

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Table 18 – Severe Housing Problems 0 - 30% AMI

30% - 50% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 30%-50% AMI category have the second highest number of households experiencing severe housing problems (180 households). As shown in **Table 19**, when considering race, Hispanic households have the highest number of households with severe housing problems at 1855 and White households are second with 10 households.

TABLE 19: SEVERE HOUSING PROBLEMS 30 - 50% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	180	30.8%	405	69.2%	0	0.0%	585
White	10	20.0%	40	80.0%	0	0.0%	50
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	0	0.0%	4	100.0%	0	0.0%	4
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	155	29.8%	365	70.2%	0	0.0%	520

Source: HUD IDIS Output, June 2019; 2011-2015 CHAS Data

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table 19 – Severe Housing Problems 30 - 50% AMI

50% - 80% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 50%-80% AMI category have the third highest number of households experiencing severe housing problems (85 households). As shown in **Table 20**, when considering race, Hispanic households have the highest number of households with severe housing problems at 65 and Asian households are second with 20 households.

TABLE 20: SEVERE HOUSING PROBLEMS 50 - 80% AMI

Housing Problems	Has one or more of four housing problems		Has none of the four housing problems		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	85	12.0%	625	88.0%	0	0.0%	710
White	0	0.0%	50	100.0%	0	0.0%	50
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	20	50.0%	20	50.0%	0	0.0%	40
American Indian, Alaska Native	0	0.0%	0	0.0%	0	0.0%	0
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	65	10.5%	555	89.5%	0	0.0%	620

Source: HUD IDIS Output, June 2019: 2011=2015 Data

**The four severe housing problems are:*

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table 20 – Severe Housing Problems 50 - 80% AMI

80% - 100% OF AREA MEDIAN INCOME

Of all the income levels within the City of Douglas, households within the 80%-100% AMI category have the lowest number of households experiencing severe housing problems (15 households). As shown in **Table 21**, when considering race, Hispanic Households are the only group affected by severe housing problems.

TABLE 21: SEVERE HOUSING PROBLEMS 80 - 100% AMI

Housing Problems	Has one or more of four housing problems*		Has none of the four housing problems*		Household has no/negative income, but none of the other housing problems		Total Households
	Total	%	Total	%	Total	%	
Jurisdiction as a whole	15	4.8%	300	95.2%	0	0.0%	315
White	0	0.0%	50	100.0%	0	0.0%	50
Black / African American	0	0.0%	0	0.0%	0	0.0%	0
Asian	0	0.0%	0	0.0%	0	0.0%	0
American Indian, Alaska Native	0	0.0%	4	100.0%	0	0.0%	4
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	15	5.9%	240	94.1%	0	0.0%	255

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS Data

**The four severe housing problems are:*

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Table 21 – Severe Housing Problems 80 - 100% AMI

DISCUSSION

Of all households in the 0%-30% AMI category, 56.1% have one or more severe housing problems. No racial or ethnic groups have rates that are 10 percentage points higher than the household rate.

Of all households in the 30%-50% AMI category, 30.8% have one or more severe housing problems. No racial or ethnic groups have rates that are 10 percentage points higher than the household rate.

Of all households in the 50%-80% AMI category, 12.0% have one or more severe housing problems. Asian (50%) racial or ethnic groups have rates that are 10 percentage points higher than the household rate.

Of all households in the 80%-100% AMI category, 4.8% has one or more severe housing problems. There are no racial or ethnic groups that have a rate that is 10 percentage points higher than the household rate.

NA-25 Disproportionately Greater Need: Housing Cost Burdens

INTRODUCTION

Again, a disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problem at a greater rate (10 percentage points or more) than the income level. Per the regulations at 91.205(b)(2), 91.305(b)(2), and 91.405, a grantee must provide an assessment for each disproportionately greater need identified.

This section includes:

1. Introduction
2. Disproportionately Greater Need—Housing Cost Burden
3. Discussion

Table 22 displays cost burden information for the City of Douglas and each racial and ethnic group, including no cost burden (less than 30%), cost burden (30-50%), severe cost burden (more than 50%), and no/negative income. The data source for this data is the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

As the data in **Table 22** suggests, there are many households who are cost burdened within their current housing situation (1,105). Hispanic households have the highest number of cost-burdened households within the City of Douglas with 1,020 households. White households are second with 64 households.

Of the homes that are cost burdened, the majority (603) of these households are cost burdened (30-50%); however, there are 489 households that are severely cost burdened within the City of Douglas.

TABLE 22: GREATER NEED: HOUSING COST BURDENS AMI

Housing Cost Burden	No Cost Burden (<=30%)		Cost Burden (30-50%)		Severe Cost Burden (>50%)		No / Negative Income		Total Households
	Total	%	Total	%	Total	%	Total	%	
Jurisdiction as a whole	2,105	64.1%	620	18.9%	485	14.8%	75	2.2%	3,285
White	295	82.2%	35	9.7%	29	8.1%	0	0.0%	359
Black / African American	10	100.0%	0	0.0%	0	0.0%	0	0.0%	10
Asian	45	50.6%	4	4.5%	0	0.0%	40	44.9%	89
American Indian, Alaska Native	4	50.0%	4	50.0%	0	0.0%	0	0.0%	8
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
Hispanic	1,740	62.3%	560	20.0%	460	16.5%	34	1.2%	2,794

Source: HUD IDIS Output, June 2019: 2011-2015 CHAS Data

Table 22 – Greater Need: Housing Cost Burdens AMI

DISCUSSION

Within the City of Douglas, 64.1% of households do not presently experience cost burden, while 18.9% experience cost burden, 14.8% experience severe cost burden and 2.2% have no/negative income.

Of all households within the City of Douglas, 18.9% are cost burdened (30-50%). American Indian/Alaska Native (50.0%) racial or ethnic groups experience a cost burden in a disproportionate percentage (greater than 10%) than all households.

Of all households within the City of Douglas, 14.8% experience severe cost burden (>50%). There are not any racial or ethnic groups that experience a disproportionate severe cost burden (greater than 10%).

Of all households within the City of Douglas, 2.2% has no/negative income. The Asian racial or ethnic category (44.9%) has a no/negative income percentage that is disproportionate (greater than 10%) to all households.

NA-30 Disproportionately Greater Need: Discussion

INCOME CATEGORIES IN WHICH A RACIAL OR ETHNIC GROUP HAS DISPROPORTIONATELY GREATER NEED

As indicated in the previous sections, several racial or ethnic groups were identified as having a disproportionately greater housing need in comparison to the income level. As detailed below, these include the American Indian/Alaska Native and Asian racial or ethnic groups.

The American Indian/Alaska Native racial or ethnic group experiences a disproportionately greater need in terms of the following:

- Housing problems in the 80-100% AMI category (100% versus 9% household average)
- Housing cost burden in the 30-50% AMI category (50% versus 18.9% household average)

The Asian racial or ethnic group experiences a disproportionately greater need in terms of the following:

- Housing problems in the 30-50% and 50-80% AMI categories (100% versus 58.1% household average and 50.0% versus 36.9% household average, respectively)
- Severe housing problems in the 50-80% AMI category (50% versus 12% household average)
- Housing cost burden no/negative income (44.9% versus 2.2% household average)

The White racial or ethnic group experiences a disproportionately greater need in terms of the following:

- Housing problems in the 0-30% category (89.7% versus 77.4% household average)

In terms of housing problems, there are 1,264 households experiencing one or more of the four identified housing problems. Of these households 1,150 or nearly 91% percent are Hispanic households.

Severe housing problems affect 740 households in the City of Douglas. Of this number, 675 are Hispanic households (91 percent).

When looking at the households with severe cost burden, a total of 485 households in Douglas are severely costs burdened. Of the total, 460 are Hispanic households (nearly 95 percent).

It should be noted that, of the 1,105 households experiencing some form of cost burden, 1,020 of those households are White households. This accounts for approximately 92 percent of all households experiencing a cost burden.

NEEDS NOT PREVIOUSLY IDENTIFIED

Based on input and data received through an extensive citizen participation process, the greatest housing needs are:

- Affordable housing for low-income persons
- Fair Housing information
- Housing rehabilitation for homeowners that cannot afford maintenance on their homes

ARE ANY OF THOSE RACIAL OR ETHNIC GROUPS LOCATED IN SPECIFIC AREAS OR NEIGHBORHOODS IN YOUR COMMUNITY?

Of the City's 17 block groups (U.S. Census 2010), 70.5 percent (12) have a low- and moderate-income percentage of 51 percent or greater. This means that there is a significant portion of low- and moderate-income persons concentrated in over half of the City. These block groups span nearly the whole city, but do not reach into the southern east and west corners of Douglas.

According to the 2013-2017 American Community Survey, the racial composition of the City of Douglas is 82.2 percent White, 6.1 percent Black/African American, 1.9 percent American Indian and Alaska Native, 1.1 percent Asian or Pacific Islander, 1.7 percent Two or More Races, and 7.0 percent some other race. It is also important to note that 73.1 percent of people in the City of Douglas identify themselves as Hispanic or Latino ethnicity. Of the City's 6 Census Tracts, none of them have a significant racial minority population; however, 5 of the 6 tracts have a significant Hispanic or Latino ethnic population.

The following Census Tracts have a significant concentration of ethnic populations:

- Census Tract 6 – 76.7% Hispanic/Latino
- Census Tract 7 – 85.9% Hispanic/Latino
- Census Tract 8 – 87.9% Hispanic/Latino
- Census Tract 9.01 – 94.9% Hispanic/Latino

- Census Tract 9.02 – 91.1% Hispanic/Latino

Source: 2013-2017 ACS Data (2010 Census Boundaries)

Data for other Census Tracts in the City of Douglas did not show any additional significant concentrations of minority populations. Of the twelve block groups with a significant proportion of low- and moderate-income persons, all fall within Census Tracts with significant concentrations of Hispanic/Latino populations. Therefore, approximately 70.6 percent of the City's block groups have a significant concentration of both minorities and low- and moderate-income persons. The data indicates a correlation between concentrations of low- and moderate-income persons. Although a disproportionate need is shown throughout for low-income Hispanic/Latino households, the data provided show that other racial and ethnic groups also have a high demand for supportive housing of different types.

NA-35 Public Housing

INTRODUCTION

The Consolidated Plan must provide a concise summary of the needs of public housing residents. Information is collected through consultations with the public housing agency or agencies located within the City's boundaries. The Public Housing portion of this report contains the following sections:

1. Introduction
2. Totals in Use
3. Characteristics of Residents
4. Race of Residents
5. Ethnicity of Residents
6. Additional Narrative

The Housing Choice Voucher (HCV) program is the federal government's major program for assisting extremely low and very-low income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing choice vouchers are administered locally by the City of Douglas Public Housing Authority (PHA). The PHA receives federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program.

The Housing Authority of Cochise County (HACC) is a county-wide government entity created for the purpose of administering housing programs for low-income persons. The operations of the HACC are funded through annual appropriations provided by U.S. Department of Housing and Urban Development (HUD). The HACC administers HCV, which allow low-income persons to rent privately owned houses or apartments dispersed throughout the community. The HACC does not own or operates any public housing units throughout the Douglas area. The City of Douglas also administers Housing Choice Vouchers.

The following data provided in this chapter covers several program types and types of vouchers in use. These vouchers are defined below:

- Certificate: The total number of Section 8 certificates administered by the Public Housing Authority (PHA).

- Mod-Rehab: The total number of units in developments that were funded under the moderate rehabilitation program administered locally by PHAs.
- Public Housing: The total number of units in developments operated by the PHAs within the jurisdiction.
- Total: The total number of Section 8 vouchers administered by the PHA (project based plus tenant based)
- Project Based: The total number of project-based Section 8 vouchers administered by the PHA
- Tenant Based: The total number of tenant-based Section 8 vouchers administered by the PHA.
- Special Purpose: Veterans Affairs Supportive Housing: The HUD–Veterans Affairs Supportive Housing program combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA).
- Special Purpose: Family Unification Program: Family Unification Program funding is allocated through a competitive process; therefore, not all PHAs administer the program.
- Special Purpose: Disabled: In this context, disabled includes non-elderly disabled, mainstream 1-year, mainstream 5-year, and nursing home transition.

TOTALS IN USE

Table 23 displays the number of vouchers and units by public housing program type. There are 89 Mod-Rehab vouchers in use, and 184 tenant-based housing vouchers in use. The data in the table below displays the number in use at the time of collection. According to the data, tenant-based vouchers are the most common voucher in use with 184 currently in use.

TABLE 23: PUBLIC HOUSING BY PROGRAM TYPE

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	89	0	184	0	184	0	0	0

Source: HUD IDIS Output, June 2019: Public Information Center (PIC) Office of Public and Indian Housing (PIH)
**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Table 23 – Public Housing by Program Type

CHARACTERISTICS OF RESIDENTS

Table 24 displays the characteristics of public housing residents by public housing program type. When analyzing the data there are several characteristics that correlate with a corresponding program type.

When looking at average annual income, persons with lower incomes tend to utilize Mod-Rehab vouchers, whereas those persons living in tenant-based programs tend to have higher incomes. The average income for Mod-Rehab is \$7,512 while the average income for tenant-based programs is \$9,836.

The number of disabled families getting assistance totals 50. In addition, 273 families are requesting accessibility features. This data shows a high number of disabled families that need housing assistance/vouchers and housing accessibility.

TABLE 24: CHARACTERISTICS OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Average Annual Income (\$)	\$0	\$7,512	\$0	\$9,836	\$0	\$9,836	\$0	\$0	\$0
Average length of stay (days)	0	4	0	6	0	6	0	0	0
Average Household size	0	3	0	2	0	2	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	19	0	76	0	76	0	0	0
# of Disabled Families	0	5	0	45	0	45	0	0	0
# of Families requesting accessibility features	0	89	0	184	0	184	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Source: HUD IDIS Output, June 2019: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 24 – Characteristics of Public Housing Residents by Program Type

RACE OF RESIDENTS

Table 25 displays the racial composition of residents for each public housing program. The data in **Table 25** displays a high number of residents utilizing these program types who are White (184). There is one resident of an American Indian/Alaska Native race; however, no other races are represented in the public housing programs.

TABLE 25: RACE OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	88	0	184	0	184	0	0	0
Black/African American	0	0	0	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	1	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Source: HUD IDIS Output, June 2019: Public Information Center (PIC) Office of Public and Indian Housing (PIH)

Table 25 – Race of Public Housing Residents by Program Type

ETHNICITY OF RESIDENTS

Table 26 displays the ethnic composition of residents for each public housing program. This table displays the ethnic composition of residents for each public housing program. The ethnic groups defined as “Hispanic” utilize more of the current vouchers in use. Most vouchers used are tenant based, with 180 residents using tenant-based programs of which 4 are “Not Hispanic”.

TABLE 26: ETHNICITY OF PUBLIC HOUSING RESIDENTS BY PROGRAM TYPE

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	87	0	180	0	180	0	0	0
Not Hispanic	0	2	0	4	0	4	0	0	0

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition
Source: HUD IDIS Output, June 2019: Public Information Center (PIC) Office of Public and Indian Housing (PIH)*

Table 26 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment

NEEDS OF PUBLIC HOUSING TENANTS AND APPLICANTS ON THE WAITING LIST FOR ACCESSIBLE UNITS

Currently the City has 184 Housing Choice Vouchers in use and, based upon the figures above, 45 families have members with some disability. These figures indicate that 184 families have requested units with accessibility features.

MOST IMMEDIATE NEEDS OF RESIDENTS OF PUBLIC HOUSING AND HOUSING CHOICE VOUCHER HOLDERS

The most immediate housing needs of Housing Choice Voucher Holders with respect to accessibility issues appear to be for additional accessible units. The increasing number of elderly and younger disabled persons creates additional need for accessible units. In broader terms, these households often need jobs, improved job skills and support services, such as access to day care, health care, and transportation to improve their employment situation and prospects.

HOW DO THESE NEEDS COMPARE TO THE HOUSING NEEDS OF THE POPULATION AT LARGE

For the City of Douglas, a resident's income and disability status are strong indicators for needing housing assistance through these various public housing programs. Public Housing and Housing Choice voucher holders, as well as applicants on waiting lists, are typically cost burdened and many are elderly and/or disabled. Due to their limited income, their housing needs include affordability, availability of assistance, accessibility improvements for the elderly and/or disabled, and Fair Housing options. Employment at a living wage is one of the greatest determining factors for housing affordability.

NA-40 Homeless Needs Assessment

INTRODUCTION

Meeting homelessness challenges in the City of Douglas is a collaborative effort comprising numerous individuals, agencies and organizations. Homelessness and the prevention of homelessness are on-going problems in Douglas. The homeless population continues to increase because of continued unemployment, high housing costs and the continuing effects of the recession and difficult housing market. However, the City is working with local and regional organizations to identify and meet the needs of homeless persons and those threatened with homelessness.

The needs of homeless persons are complex and require a wide range of specialized services and the City does not possess the resources to address this problem. The City continues to rely upon other entities and agencies to provide services such as housing, mental health counseling, employment training, and case work services. The City has one homeless shelter, but most of the services for the homeless are in Bisbee or Douglas.

HOMELESS NEEDS ASSESSMENT

There currently is no accurate count of the number of homeless persons in Douglas. The Balance of State counts included in the Department of Economic Security Annual Reports do not break out numbers for Douglas, specifically. However, within Cochise County there are generally two types of persons who are homeless: 1) Families and individuals who have fallen into homelessness because of financial or personal crises leading to eviction; and 2) Chronically homeless single individuals living on the streets and in shelters.

TABLE 27(A): HOMELESS NEEDS ASSESSMENT

Population	Estimate the # of persons experiencing homelessness on a given night*		Estimate the # experiencing homelessness each year**	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	N/A	1	N/A	N/A	N/A	N/A
Persons in Households with Only Children	N/A	N/A	N/A	N/A	N/A	N/A
Persons in Households with Only Adults	N/A	77	N/A	N/A	N/A	N/A
Chronically Homeless Individuals	N/A	33	N/A	N/A	N/A	N/A
Chronically Homeless Families	N/A	1	N/A	N/A	N/A	N/A
Veterans	N/A	12	N/A	N/A	N/A	N/A
Unaccompanied Child	N/A	0	N/A	N/A	N/A	N/A
Persons with HIV	N/A	0	N/A	N/A	N/A	N/A

January 23, 2018 PIT Survey for Cochise County, supplied by the Arizona Balance of State Continuum of Care

Table 27(A) – Homeless Needs Assessment

JURISDICTION’S RURAL HOMELESS POPULATION [NONE]

The 2018 PIT was conducted between January 23, 2018 and January 28, 2018. Respondents interviewed for the PIT were specifically asked about where they were physically staying and their personal status on the night of Tuesday, January 23, 2018.

The 2018 AZBoSCoC identified 2,187 persons experiencing homelessness in Balance of State Communities. This is a 24% increase over the prior year count. 1,085 of all persons (49.6%) were unsheltered, a 53% increase over 2017’s PIT results. 2018 PIT count numbers were up for almost every sub population compared to 2017.

The data in the County reports is focused on the individuals and their household members who were unsheltered on the night of January 23, 2018. The 2018 PIT resulted in 78 households completed surveys within Cochise County. More specifically, 5 households reside within the City of Douglas. The 2018 PIT county specifically states that 33 persons within Cochise County are chronically homeless.

HOMELESS POPULATION TYPES INCLUDING CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH)

Chronically homeless

HUD defines a person as chronically homeless if they are an unaccompanied individual with a disabling condition and have been homeless for one year or longer or have had four or more episodes of homelessness within the past three years. National studies have found that when all costs are factored in, chronically homeless persons account for more than 50 percent of the system's resources. This percentage is based on a nationwide estimate that 10 percent of all homeless persons are considered as chronically homeless. In Douglas, there is no accurate way to measure the current percentage of chronically homeless persons.

Families

In Douglas, there is no accurate way to measure the current percentage of homeless persons. For the County, most households counted during the 2018 PIT count were individuals. Only one household identified as having a child.

Veterans

In Douglas, there is no accurate way to measure the current percentage of homeless persons; however, the 2018 PIT count identifies 12 persons that are homeless and have served in the military within Cochise County.

Unaccompanied Youth

There were no unaccompanied youth counted in the 2018 PIT count within Cochise County.

FAMILIES IN NEED OF HOUSING ASSISTANCE

In Douglas, there is no accurate way to measure the current percentage of homeless persons or families in need of housing assistance; however, the 2018 PIT count shows that the vast majority of homeless household within Cochise County are individuals and not families.

NATURE AND EXTENT OF HOMELESSNESS BY RACIAL AND ETHNIC GROUP

Homelessness is not unique to a gender, race or ethnicity; however, Douglas, does not have an accurate way to measure the current percentage of homeless persons by racial or ethnic group. Within the County, 74 identified as White, 3 are African American, 1 is Asian, 3 are Native American, and 2 are multi-racial households. This is a total of 83 persons.

TABLE 27(B): HOMELESSNESS BY RACIAL AND ETHNIC GROUP

Race	Sheltered	Unsheltered
White	N/A	74
Black or African American	N/A	3
Asian	N/A	1
American Indian or Alaska Native	N/A	3
Pacific Islander	N/A	N/A
Ethnicity	Sheltered	Unsheltered
Hispanic	N/A	21
Not Hispanic	N/A	62

January 23, 2018 PIT Survey for Cochise County, supplied by the Arizona Balance of State Continuum of Care

Table 27(B) – Homelessness by Racial and Ethnic Group

NATURE AND EXTENT OF UNSHELTERED AND SHELTERED HOMELESSNESS, INCLUDING RURAL HOMELESSNESS

The Arizona Balance of State counts included in the HUD 2018 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Report and Department of Economic Security Annual Reports identify 19 persons being sheltered. This is 5.25% of the sheltered population in the State of Arizona. The number of unsheltered homeless persons for Cochise County is 83. This comprises 7.65% of the unsheltered population in the State of Arizona.

DISCUSSION

In Douglas, there is no accurate way to measure the current percentage of homeless persons. However, there are approximately 83 households in Cochise County that can be classified as homeless.

NA-45 Non-Homeless Special Needs Assessment

INTRODUCTION

A broad category that applies to any population that is presumed to be low- and moderate-income and in need of public services, non-homeless special needs include those of the mentally ill, developmentally disabled, at-risk youth, elderly, and other groups such as persons with HIV/AIDS. These special needs are often addressed by non-profit agencies, usually in coordination with the City of Douglas or Cochise County.

Certain population groups require supportive services and/or supportive housing, either on a permanent basis, or on a temporary basis. Many special needs populations are very low-income households (below 50% of Median Family Income) because they are not able to work or can only work on a part-time basis. Special population groups include the elderly and frail elderly, the physically and developmentally disabled, severely mentally ill persons, and those with substance abuse issues.

Many disabled individuals rely on Supplemental Security Income (SSI) for financial support. SSI provides income support to persons 65 years and over, the blind, and the disabled. Since many disabled persons have limited incomes, finding affordable and accessible housing is often a serious challenge. Even when new affordable rental housing is developed, the rental rates for the housing units are often too high for many disabled persons.

In addition, these persons often require various types of special assistance, program activities to enhance their quality of life, and respite care for their caregivers. Support for municipal programs as well as assistance to not-for-profit organizations is necessary for the implementation of these types of activities.

HUD has identified special needs populations and has provided data on several of these through the data. However, detailed information on some special needs populations is often not available from census or HUD data sources. The City has used information from reliable sources or calculations from entities such as ARC (for the developmentally disabled), the National Institutes of Mental Health, or the National Institute of Alcohol and Alcohol Abuse to estimate the numbers of persons in those categories. Where possible, figures from reliable local sources are used to support these analyses.

While the City’s resources are insufficient to address the needs of all these groups, the City is committed to supporting other entities in their efforts to provide needed resources.

At this time, as a new entitlement community, the City is developing relationships with community service organizations, not-for-profit service providers, housing developers, and other state and regional agencies to determine how the City can best assist in providing needed resources to the special needs population.

CHARACTERISTICS OF SPECIAL NEEDS POPULATIONS

Understanding the characteristics of its special needs populations will help the City of Douglas to better evaluate public facilities and services directed toward such needs.

Elderly & Frail Elderly

According to the 2013-2017 American Community Survey (ACS) 5-Year Estimates, nearly 9 percent of the City of Douglas’s population is over 65 years of age (1,458). Of all individuals for whom poverty status is determined, just over 20 (21.2) percent are categorized as both 65 years of age and over and living below the poverty level (309).

The City of Douglas’s population over the age of 85 years is 240 or 1.4 percent according to the 2013-2017 ACS 5-Year Estimates. The City can expect this percentage to remain steady over the next few years, as approximately 1.3 percent of the population is between 75 and 84 years of age (411).

According to HUD’s Comprehensive Housing Affordability Strategy (CHAS), HUD defines “elderly” as individuals over the age of 62 and “frail elderly” as individuals over the age of 75. According to the 2013-2017 ACS 5-Year Estimates, there are 651 individuals over the age of 75 living in the City of Douglas. Due to age, the frail elderly may be unable to care for themselves adequately and may have one or more disabilities or need assistance to perform the routine activities of daily life. According to 2013-2017 ACS 5-Year Estimates, there are 264 individuals between 65 and 74 years of age with disabilities and 342 frail elderly individuals over the age of 75 with disabilities.

Considering the 2013-2017 ACS 5-Year Estimates and the City's housing problem (i.e., households experiencing at least one housing problem) percentage of nearly 37 percent, of the 724 persons between the ages of 65-74 there are approximately 268 households experiencing at least one housing problem. Additionally, of the 602 persons over the age of 75 there are 223 households experiencing at least one housing problem.

Youth and Young Adults

Approximately 3,205 children live in the City of Douglas. According to the 2013-2017 ACS 5-Year Estimates, 19.3 percent of the City of Douglas's population is under 18 years of age. Of the population under 18 years of age, 35.8 percent or 1,147 children are living in poverty.

Thirty-nine and a half percent of the households within the City are households with children. According to the 2013-2017 ACS 5-Year Estimates, female-headed households comprise 25.3 percent of the households within the City and 50.6 percent of families below poverty level are female-headed households.

Physically & Developmentally Disabled

According to the 2013-2017 ACS 5-Year Estimates, disabilities are categorized into six types: hearing difficulty, vision difficulty, cognitive ability, ambulatory difficulty, self-care difficulty, and independent living difficulty. According to the 2013-2017 ACS 5-Year Estimates, approximately 1,360 or 14.1 percent of people in the City of Douglas reported having a disability. The majority (981 people or 72.1 percent) of this population is over the age of 35.

Physically Disabled: Physically disabled persons are those having an impairment which impedes their ability to function independently. According to the 2013-2017 ACS 5-Year Estimates, the adult noninstitutionalized population between the ages of 18 years of age and older is 13,354. Persons who have a physical disability may suffer from a hearing difficulty, vision difficulty, or an ambulatory difficulty. According to the same ACS dataset, there are approximately 1,357 (10.2 percent) over the age of 18 who have a physical disability. These persons may also have a cognitive, self-care, and independent living impairment as well, and are also included in the developmentally disabled count.

Developmentally Disabled: The American Community Survey defines disability as a long-lasting physical, mental, or emotional condition. Persons who have a developmental disability may suffer from a cognitive difficulty, a self-care difficulty, or an independent living difficulty. According to the American Community Survey, this condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home or to work at a job or place of business.

The adult population over the age of 18 years is 13,354. According to the American Community Survey, 1,008 persons or 7.5 percent of people over the age of 18 have a developmental disability. These persons may also have a hearing, vision, and ambulatory impairment as well, and are also included in the physically disabled count.

Mental Illness & Substance Abuse

The Department of Housing and Urban Development, in the Comprehensive Housing Affordability Strategy (CHAS) manual, defines severe mental illness as a persistent mental or emotional impairment that significantly limits a person's ability to live independently. According to the national statistics, approximately one percent of the adult population meets the definition of severely mentally ill based on diagnosis, duration and disability. According to the American Community Survey, the City of Douglas has an estimated civilian noninstitutionalized adult population (over 18 years of age or older) of 13,354 persons. One percent of this population is 133 persons.

Substance abuse is defined as having an excessive and impairing use of alcohol or other drugs, which includes addiction. The City has no direct data upon which to reliably estimate the number of persons with alcohol/other drug addiction problems. However, various organizations and bodies have supplied figures on this topic from a national perspective.

The National Institute of Alcohol Abuse and Alcoholism estimates that 16 to 17 percent of the male population over the age of 18 has a drinking problem and that six percent of women over the age of 18 have this problem. These estimates mean that in Douglas an estimated 1,799 males and 935 women need supportive services for alcohol alone.

According to the 2012 *National Survey on Drug Use and Health* (NSDUH), conducted by the Substance Abuse and Mental Health Services Administration (SAMHSA), an estimated 23.9 million Americans in 2012 had substance dependence or abuse (9.2 percent of the total population aged 12 or older). Applying these statistics to Douglas’s population, approximately 1,523 persons over the age of 12 had substance dependence or abuse in 2012.

Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking

There is not a reliable method of collecting this data in Douglas.

HOUSING AND SUPPORTIVE SERVICE NEEDS AND DETERMINATION

Please see the preceding responses.

PUBLIC SIZE AND CHARACTERISTICS OF POPULATION WITH HIV / AIDS

Persons who are HIV positive do not, simply by virtue of having the HIV antibody, require special housing. Figures for HIV/AIDS are not available for Douglas specifically. However, data from the Arizona Department of Health Services provides information about the prevalence and incidence of HIV/AIDS at the County level. The prevalence has been climbing steadily since 2004.

DISCUSSION

Non-Homeless Special Needs is a broad category that applies to any population that is presumed to be low- and moderate-income and in need of public services. The category covers a large population, including the mentally ill, developmentally disabled, elderly, and other groups.

Based on input and the data received through the citizen participation process, the highest priorities identified by the public are:

- Comprehensive ADA improvements city wide to improve accessibility and independence of the elderly, and persons with physical and developmental disabilities.
- Public Service Programs, especially for the Elderly, and for Healthcare

Services to address these needs are provided by non-profit agencies. The City is limited on CDBG resources and will work to be a resource for these many agencies that are overburdened and continue to need funding assistance for service delivery.

NA-50 Non-Housing Community Development Needs

PUBLIC FACILITIES NEEDS

Non-Housing Community Development is a broad category of spending that covers many types of public facilities, infrastructure, and social services that benefit low- and moderate-income neighborhoods.

Based on the needs assessment and input received through the citizen participation process, including public meetings, the following non-housing community development needs were identified:

- Fairly distributed public facility and infrastructure improvements (streets, neighborhoods)
- Street repaving/resurfacing
- Athletic or sport-focused public facilities improvements
- Sidewalks improvements

PUBLIC FACILITIES NEED DETERMINATION

Non-housing Community Development needs and priorities were identified in the course of preparing this Consolidated Plan through the input of community leaders, citizen participation, City Departments and requests and ideas from service providers and public agencies. These inputs were provided in meetings and public hearings, as described in the public participation section of this Plan. Further, the Housing Department is in contact with County and State departments and agencies that often raise issues and concerns or make requests about improvements or conditions in the low/mod neighborhoods.

The City will consider the many and varied needs, and the funding and project selection process will reflect the input and weighing of needs and requests in light of the overall objective.

PUBLIC IMPROVEMENTS NEEDS

Non-Housing Community Development is a broad category of spending that covers many types of public improvements such as roads, water/sewer improvements, lighting, drainage, and other capital projects

that benefit low- and moderate-income neighborhoods. Based on the need's assessment, input received through the citizen participation process, including public meetings, the following public improvements needs were identified:

- Public improvements that support redevelopment including street improvements and sidewalks, in order to promote additional public and private investment.

The City has been active in developing and maintaining public improvements in light of the many needs of the City and the limited resources available. Public Improvements and Infrastructure receive a High ranking here because they are a means to make significant improvements in the quality of life in the distressed neighborhoods. With proper planning and coordination, the City can leverage CDBG funds with both the State and other federal programs to provide the funds needed for these projects.

PUBLIC IMPROVEMENTS NEED DETERMINATION

These needs were determined through an approach that included a citizen participation process and review of other plans and documents. The citizen participation process was conducted through a series of meetings including: two public hearings, and consultation with city departments (including public works and leisure services).

PUBLIC SERVICES NEEDS

Public Services is a broad category that applies to any population that is presumed to be low- and moderate-income and in need of public services. Public services address the mentally ill, developmentally disabled, elderly, and other groups such as persons with HIV/AIDS. The City wishes to do all that it can to improve the quality of life for its most vulnerable low and moderate-income populations, including the elderly, the disabled, and the homeless; however, these public services are often provided by non-profit agencies, usually in coordination with the City of Douglas, Cochise County, and the State of Arizona.

Based on the needs assessment and input received through the citizen participation process, including stakeholder and public meetings, the following public services needs were identified:

- Public Service Programs, especially for the Elderly, and for Healthcare
- Job training

- Fair Housing
- Homeless Activities and Prevention

PUBLIC SERVICES NEED DETERMINATION

These needs were determined through an approach that included a citizen participation process and review of other plans and documents. The citizen participation process was conducted through a series of meetings including: two public hearings, and consultation with city departments (including public works and leisure services).

MA-05 Overview

HOUSING MARKET ANALYSIS OVERVIEW:

The purpose of the Market Analysis is to provide a clear picture of the environment in which City of Douglas must administer its programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis will provide the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section are populated with a default data set based on the most recent data available. Additional data has been obtained from various sources, including more current American Community Survey (ACS) estimates and local data sources such as City of Douglas and Cochise County. This section covers the following broad topics:

- General Characteristics of the Housing Market: The general characteristics of the City's housing market, including supply, demand, and condition and cost of housing, are described in the following sections: Number of Housing Units (MA-10); Cost of Housing (MA-15); and, Condition of Housing (MA-20).
- Lead-based Paint Hazards: The Condition of Housing (MA-10) section provides an estimate of the number of housing units within City of Douglas that are occupied by low-income families or moderate-income families that contain lead-based paint hazards.
- Public and Assisted Housing: A description and identification of the public housing developments and public housing units in City of Douglas is provided in the Public and Assisted Housing (MA-25) section. This narrative details the physical condition of such units, the restoration and revitalization needs, Section 504 needs, and the public housing agency's strategy for improving the management and operation of public housing and the living conditions of low- and moderate-income families in public housing.
- Assisted Housing: The information collected in the Number of Housing Units (MA-10) section describes the number and targeting (income level and type of family served) of units currently assisted by local, state, or Federally funded programs and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, such as expiration of Section 8 contracts.

- *Facilities, Housing, and Services for Homeless Persons:* A brief inventory of facilities, housing, and services that meet the needs of homeless persons within the City is provided in the Homeless Facilities and Services (MA-30) section. An emphasis is given to chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. The inventory includes services directly targeted to homeless persons, as well as mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.
- *Special Need Facilities and Services:* The Special Needs Facilities and Services (MA-35) section describes the housing stock available to serve persons with disabilities and other low-income persons with special needs, including persons with HIV/AIDS and their families. The section further describes the facilities and services that assist persons who are not homeless, but who require supportive housing and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
- *Barriers to Affordable Housing:* This section (MA-40) provides an assessment of the regulatory barriers to affordable housing that exist within City of Douglas. These regulatory barriers may include tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

MA-10 Number of Housing Units – 91.210(a) & (b)(2)

INTRODUCTION

The total number of housing units in City of Douglas has decreased over the past decade. The City had a total of 6,192 housing units at the time of the 2009 U.S Census and 4,383 housing units at the time of the 2013-2017 U.S. Census. Between 2009 and 2017, the total number of housing units in the City fell by nearly 30%.

TABLE 28: ALL RESIDENTIAL PROPERTIES BY NUMBER OF UNITS

Property Type	Number	%
1-unit detached structure	3,133	71.5%
1-unit, attached structure	109	2.5%
2-4 units	444	10%
5-19 units	432	10%
20 or more units	29	0%
Mobile Home, boat, RV, van, etc.	236	5.5%
Total	4,383	100%

Data Source: 2013-2017 ACS
 Universe: Total Housing Units

Table 28 – Residential Properties by Unit Number

As shown in **Table 28**, data from the 2013-2017 ACS show that most residential properties are single units (a total of 3,242 or nearly 74%). Single-unit properties are either detached structures (3,133 or 71.5%) or attached structures (109 or 2.5%). Residential properties are further categorized into properties within 2-4-unit structures (444 or 10%), properties within 5-19-unit structures (432 or 10%), and properties within 20 or more-unit structures (29 or approximately 0%). These categories comprise 94.5% of the City’s housing stock. The remainder of residential properties in the City is classified as mobile home, boat, RV, van, etc. (236 or 5.5%).

TABLE 29: UNIT SIZE BY TENURE

	Owners		Renters	
	Number	%	Number	%
No bedroom	59	3%	84	6.4%
1 bedroom	52	2.4%	222	17.1%
2 or 3 bedrooms	1,562	73.6%	919	70.7%
4 or more bedrooms	449	21%	75	5.8%
Total	2,122	100%	1,300	100%

Data Source: 2013-2017 ACS

Universe: Occupied Housing Units

Table 29 – Unit Size by Tenure

As shown in **Table 29**, there are an estimated 3,422 occupied housing units within the City. Of this total, 2,122 or 62% are owner-occupied and 1,300 or 38% are renter occupied.

Of all owner-occupied units, most contain 2 or more bedrooms (2,011 or approximately 95%), while a small percentage contain one bedroom (52 or around 2.4%). There are also a small number of owner-occupied units without bedrooms (59 or 3%).

Of all renter-occupied units, most contain 2 or more bedrooms (994 or 76.5%). In contrast to owner-occupied units, a modest percentage of renter-occupied units have 1 bedroom (222 or 17.1%). Only a small percentage of renter-occupied units are without bedrooms (84 or 6.4%).

DESCRIBE THE NUMBER AND TARGETING (INCOME LEVEL/TYPE OF FAMILY SERVED) OF UNITS ASSISTED WITH FEDERAL, STATE, AND LOCAL PROGRAMS.

The City is developing relationships with community service organizations, not-for-profit service providers, housing developers, housing lenders, and other state and regional agencies to determine how the City can best assist in providing needed housing assistance and programs to the City’s low/mod population.

PROVIDE AN ASSESSMENT OF UNITS EXPECTED TO BE LOST FROM THE AFFORDABLE HOUSING INVENTORY FOR ANY REASON, SUCH AS EXPIRATION OF SECTION 8 CONTRACTS.

Though the City has 184 Housing Choice Vouchers, there is no data to estimate the potential loss of units.

DOES THE AVAILABILITY OF HOUSING UNITS MEET THE NEEDS OF THE POPULATION?

The City has a very high percentage of single unit, detached structures when compared to the figures of structures with 2 to 4 units (duplexes and townhomes), or more. The City does have a relatively low percentage of large units (4 or more bedrooms), and a higher percentage of two to three-bedroom units.

In light of the relatively larger household size in the City (34.2% of households have 4 or more persons) and the relatively high incidence of overcrowding among lower income households (both owner and renter) noted in the Needs Analysis, there appears to be a need for affordable larger units to accommodate the number of large family households.

DESCRIBE THE NEED FOR SPECIFIC TYPES OF HOUSING:

Based upon the numbers presented above, the City does need additional affordable rental units for larger households in order to relieve overcrowding.

DISCUSSION

The number of housing units in the City has decreased over the last decade. A shortage of affordable housing may exist for very low-income households earning less than 30% HAMFI; however, there is a somewhat diverse distribution of housing types available within the City.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

INTRODUCTION:

This section provides an overall picture of housing costs within City of Douglas, including housing cost and rent trends, fair market rents, and affordability.

TABLE 30: COST OF HOUSING

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	\$88,000	\$88,200	0%
Median Contract Rent	\$371	\$459	24%

Data Source: 2005-2009 ACS (Base Year), 2013-2017 ACS (Most Recent Year)

Table 30 – Cost of Housing

TABLE 31: RENT PAID

Rent Paid	Number	%
Less than \$500	497	40.2%
\$500-999	663	54%
\$1,000-1,499	72	5.8%
\$1,500 or more	0	0%
Total	1,232	100%

Data Source: 2013-2017 ACS

Universe: Occupied Units Paying Rent

**Values in order from first row to last row of percentage column are 40%, 54%, 6%, and 0%.*

Table 31 – Rent Paid

The costs of housing trends for City of Douglas are displayed in **Table 30**. According to the 2013-2017 ACS, the current median home value for City of Douglas is estimated to be \$88,200. This figure represents a 0.2% increase from the 2009 ACS median home value of \$88,000. Between the 2009 ACS and the 2013-2017 ACS, the median contract rent within the City increased by 23.7%, from \$371 to \$459.

The distribution of estimated rents paid within City of Douglas is detailed in **Table 31**, according to 2013-2017 ACS data. Of the approximately 1,300 rental units within the City, the majority (663 or 54%) have a rent between \$500 and \$999. A significant percentage of rental units have a rent less than \$500 (497 or 40.2%), while 72 or 5.8% have a rent between \$1,000 and \$1,499. No one within the City who lives in a rental unit has a rent that exceeds \$1,500.

TABLE 32: HOUSING AFFORDABILITY

% Units affordable to Households	Renter	Owner
30% HAMFI	235	No Data
50% HAMFI	665	490
80% HAMFI	1,120	990
100% HAMFI	No Data	1,269
Total	2,020	2,749

Data Source: 2011-2015 CHAS

Table 32 – Housing Affordability

The overall housing affordability within City of Douglas is detailed in **Table 32**. According to HUD, a unit is considered affordable if gross rent, including utilities, is no more than 30% of the household income. The table, based on 2011-2015 CHAS data, first divides households into four income ranges: less than or equal to 30% HUD Adjusted Median Family Income (HAMFI), less than or equal to 50% HAMFI, less than or equal to 80% HAMFI, and less than or equal to 100% HAMFI. The table also separates housing units into either rental units or owner units.

For households with incomes less than or equal to 30% HAMFI, a total of 235 available rental units are affordable, while no data is available for owner units. For households with incomes less than or equal to 50% HAMFI, a total of 665 affordable rental units are available, while 490 affordable owner units are available. For households with incomes less than or equal to 80% HAMFI, a total of 1,120 affordable rental units are available, while 990 affordable owner units are available. Finally, for households with incomes less than or equal to 100% HAMFI, a total of 1,269 affordable owner units are available, while no data is provided for affordable rental units.

As noted previously in **Table 29**, an estimated 1,300 renter-occupied housing units are located within City of Douglas (2013-2017 ACS). Of this total, only around 18% of renter-occupied housing units are affordable to the lowest income households (less or equal to 30% AMFI) and 51% are affordable to households earning less than or equal to 50% AMFI. A much larger percentage (86%) of renter-occupied housing units are affordable to households earning less than or equal to 80% AMFI.

An estimated 2,122 owner-occupied housing units are located within City of Douglas (see **Table 29**). Of this total, 23% are affordable to households earning less than or equal to 50% HAMFI, nearly 47% are affordable to households earning less than or equal to 80% HAMFI, and nearly 60% are affordable to

households earning less than or equal to 100% HAMFI.

TABLE 33: MONTHLY RENT

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$638	\$642	\$823	\$1,190	\$1,446
High HOME Rent	\$638	\$642	\$823	\$1,009	\$1,106
Low HOME Rent	\$511	\$548	\$657	\$759	\$847

Data Source: HUD FY2019 FMR and 2018 HOME Rents for Sierra Vista-Douglas, AZ

Table 33 – Monthly Rent

Table 33 shows HUD FY2019 Fair Market Rents and HOME Rents for Sierra Vista-Douglas, Arizona. Fair Market Rents (FMRs) are gross rent estimates that include rent plus the cost of all tenant-paid utilities. FMRs are set to the dollar amount at which 40% of the standard-quality rental housing units are rented, excluding non-market rental housing (e.g. public housing). High HOME Rents are equal to the FMR or 30% of the adjusted income of a family whose income equals 65% AMI, whichever is lower. Low HOME Rents are equal to 30% of the adjusted income of a family whose income equals 50% AMI.

IS THERE SUFFICIENT HOUSING FOR HOUSEHOLDS AT ALL INCOME LEVELS?

A comparison of the total number of households at the various income levels (see **Table 6**) and the total number of affordable housing units available for the various income levels (see **Table 32**) can reveal surpluses or shortages of affordable housing.

Because only 235 affordable rental units are identified in the CHAS database for persons with an income of 30% HAMFI or less, and an undetermined number of owner units are available, a significant shortage of affordable units likely exists within the City for very low-income households. In contrast, there appears to be sufficient housing for low-income households. A total of 585 households in the City earn more than 30% HAMFI but less than or equal to 50% HAMFI. According to the CHAS database, 900 rental-units and 490 owner-units are available and affordable to this income group. There also appears to be sufficient housing for moderate income households. A total of 1,295 households in the City earn more than 30% HAMFI but less than or equal to 80% HAMFI. There are approximately 2,020 affordable rental units and 1,480 affordable owner-units available, according to the CHAS database.

HOW IS AFFORDABILITY OF HOUSING LIKELY TO CHANGE CONSIDERING CHANGES TO HOME VALUES AND/OR RENTS?

The estimated median home value within City of Douglas increased approximately 41% from \$62,700 in 2000 to \$88,200 in 2017 according to the ACS for those years. Evidently, the long-term trend in housing value has been positive growth, as evidenced by the large increase in median home value between the 2000 U.S. Census and the 2013-2017 ACS. Over this same period, the City's median contract rent increased by 60% from \$287 to \$459.

The City's median household income increased 51% between the 2000 ACS and the 2013-2017 ACS from \$20,567 to \$30,986. Although income rates are currently growing faster than housing value rates, trends can indicate that median housing values could increase at a faster rate than median household incomes. Therefore, it can be anticipated that housing within the City will generally become less affordable to households.

HOW DO HOME RENTS / FAIR MARKET RENT COMPARE TO AREA MEDIAN RENT? HOW MIGHT THIS IMPACT YOUR STRATEGY TO PRODUCE OR PRESERVE AFFORDABLE HOUSING?

The City's current median contract rent is estimated to be \$459 (according to the 2013-2017 ACS). This median contract rent is lower than the Fair Market Rents for efficiency units, 1 bedroom, 2-bedroom 3 bedroom and 4-bedroom units. In terms of High HOME Rent and Low HOME Rent, the trend is the same. The current median contract rent for City of Douglas is lower than the HOME Rents for all unit sizes.

DISCUSSION:

Within the City of Douglas, there is a potential shortage of affordable units to extremely low- and very low-income households. The cost of housing has increased significantly over the past decade, as have household incomes. There is a potential that costs outpace household incomes, and housing may become less affordable to low- and moderate-income households.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

INTRODUCTION

This section describes the significant characteristics of the housing market in terms of the condition of housing. Additionally, it provides a summary of the housing stock available to serve persons with disabilities and persons with HIV/AIDS and their families.

Generally, the supply and location of housing in City of Douglas is adequate, but in many cases the quality of the units available is substandard regarding maintenance, accessibility, and energy efficiency.

DEFINITIONS

The following definitions pertain to this section:

- “Standard condition” – A housing unit that meets HUD Housing Quality Standards (HQS) and all applicable state and local codes.
- “Substandard condition but suitable for rehabilitation” – A housing unit that contains one or more housing conditions (defined below), contains a lead-based paint hazard, and/or is condemned as unfit for human habitation under City of Douglas’s Code of Ordinances, but is both structurally and financially feasible to rehabilitate.
- “Substandard condition not suitable for rehabilitation” – A housing unit that contains one or more housing condition (defined below), contains a lead-based paint hazard, and/or is condemned as unfit for human habitation under City of Douglas’s Code of Ordinances, and is not structurally or financially feasible to rehabilitate.

TABLE 34: CONDITION OF UNITS

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	527	25%	696	53.5%
With two selected Conditions	18	0%	66	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	7	0%
No selected Conditions	1,577	74%	531	40.8%
Total	2,122	100%	1,300	100%

Data Source: 2013-2017 ACS

Table 34 – Condition of Units

Table 34 shows the condition of occupied housing units within City of Douglas, with a breakdown of owner-occupied units and renter-occupied units. As defined by HUD, a housing “condition” includes the following:

- A housing unit that lacks complete plumbing facilities
- A housing unit that lacks complete kitchen facilities
- A housing unit with more than one person per room
- A housing unit with a cost burden greater than 30% of the occupant’s household income

According to 2013-2017 ACS data, the majority (1,577 or 74%) of owner-occupied housing units have no housing conditions. Of the remaining owner-occupied housing units, none feature more than two housing conditions, leaving (545 or nearly 26%) with one or two housing conditions. Only 18 owner-occupied units (less than 1%) have two housing conditions.

Of the estimated 1,300 renter-occupied housing units in the City, the majority (762 or 58.6%) have one or two housing conditions. Just over forty (40) percent of renter-occupied units have no housing conditions. There are no renter-occupied units that have three one housing conditions, and only 7 (less than 1%) that reported having four housing conditions.

TABLE 35: YEAR UNIT BUILT

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	199	9%	248	19%
1980-1999	331	16%	322	24%
1950-1979	990	47%	294	23%
Before 1950	602	28%	436	34%
Total	2,122	100%	1,300	100%

Data Source: 2013-2017 ACS

Table 35 – Year Unit Built

The age of housing within City of Douglas is detailed in **Table 35**. Of the approximately 2,122 owner-occupied housing units, 990 or 47% were built between 1950 and 1979, 331 or 16% were built between 1980 and 1999, and 199 or 9% were built during 2000 or later. A moderate number (602 or 28%) of owner-occupied housing units were built before 1950.

Of the approximately 1,300 renter-occupied housing units, 294 or 23% were built between 1950 and 1979, 322 or 24% were built between 1980 and 1999, and 248 or 19% were built during 2000 or later. A large number (436 or 34%) of renter-occupied units were built before 1950.

TABLE 36: RISK OF LEAD-BASED PAINT HAZARD

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,592	75%	730	56%
Housing Units build before 1980 with children present	257	13%	140	11%

Data Source: 2013-2017 ACS (Total Units); 2011-2015 CHAS (Units with Children present)

Table 36 – Risk of Lead-Based Paint

The risk of lead-based paint hazards within City of Douglas is estimated in **Table 36**. Because the actual number of housing units in the City with lead-based paint is not available, an assumption must be made. For the purposes of this plan, a housing unit built before 1980 is presumed to have a higher risk of lead-based paint. Therefore, the table shows the total number of owner-occupied and renter-occupied units that were built before 1980, as well as those built before 1980 with children present. The data for this table is from the 2013-2017 ACS and 2011-2015 CHAS.

As shown in **Table 36**, 1,592 or 75% of owner-occupied housing units in the City were built prior to 1980, while 527 or 13% were built before 1980 and have children present. For renter-occupied housing units, 730 or 56% were built prior to 1980, while 140 or 11% were built prior to 1980 and have children present.

TABLE 37: VACANT UNITS

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	N/A	N/A	961
Abandoned Vacant Units	N/A	N/A	N/A
REO Properties	N/A	N/A	171
Abandoned REO Properties	N/A	N/A	N/A

Data Source: 2013-2017 ACS; RealtyTrac Accessed June 2019

Table 37 - Vacant Units

According to 2013-2017 ACS data, there are a total of 3,422 housing units within City of Douglas. Of these, 961 or approximately 28% are vacant (See **Table 37**). Based on the citywide percentage of all

housing units built prior to 1980 (75%), approximately 721 vacant units may be suitable for rehabilitation.

Additionally, the term “abandoned vacant unit” is defined by HUD as:

- A housing unit that has been foreclosed upon and vacant for at least 90 days.
- A housing unit where no mortgage or tax payments have been made by the property owner for at least 90 days.
- A housing unit where a code enforcement inspection has determined that the property is not habitable, and the owner has taken no corrective actions within 90 days of the notification of the deficiencies.

According to the foreclosure database maintained by RealtyTrac.com, as accessed in June 2019, a total of 26 properties are in some state of foreclosure (i.e., default, auction or bank owned). In May 2019, the number of properties that filed for foreclosure in City of Douglas was 50% higher than the previous month and 200% higher than the same time last year. In total, the foreclosure rate for the City of Douglas only slightly higher than the foreclosure rate countywide, statewide, and national foreclosure rates.

MA-25 Public and Assisted Housing – 91.210(b)

INTRODUCTION

As was noted earlier in Section NA-35, the Housing Department of the City of Douglas carries the responsibility of the administration of housing programs for low-income persons. The operations of the Housing Department are reliant upon annual appropriations provided by U.S. Department of Housing and Urban Development.

TABLE 38: TOTALS NUMBER OF UNITS

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers available	-	64	-	193	-	193	0	0	0
# of accessible units	-	-	-	-	-	-	-	-	-

Data Source: PIC (PIH Information Center)

**includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition*

Table 38 – Total Number of Units by Program Type

DESCRIBE THE SUPPLY OF PUBLIC HOUSING DEVELOPMENTS:

The City does not have any public housing developments. There are 184 Housing Choice Vouchers for Douglas.

DESCRIBE THE NUMBER AND PHYSICAL CONDITION OF PUBLIC HOUSING UNITS IN THE JURISDICTION, INCLUDING THOSE THAT ARE PARTICIPATING IN AN APPROVED PUBLIC HOUSING AGENCY PLAN:

Not Applicable.

TABLE 39: PUBLIC HOUSING CONDITION

Public Housing Development	Inspection Score
N/A	N/A

Table 39 – Public Housing Condition

DESCRIBE THE RESTORATION AND REVITALIZATION NEEDS OF PUBLIC HOUSING UNITS IN THE JURISDICTION:

Not Applicable.

DESCRIBE THE PUBLIC HOUSING AGENCY'S STRATEGY FOR IMPROVING THE LIVING ENVIRONMENT OF LOW- AND MODERATE-INCOME FAMILIES RESIDING IN PUBLIC HOUSING:

The City of Douglas administers the HCV program and has included the Family Self-Sufficiency Program to assist low- and very low-income families to become economically and socially self-sufficient.

The Family Self-Sufficiency (FSS) program is a tool to assist Section 8 Clients to achieve the best life possible for themselves and their families. The FSS program empowers individuals to look for economic stability through education, case management and referral to available resources in the community that help them attain their goals.

DISCUSSION:

The Housing Department administers housing programs for low-income persons through annual appropriations provided by HUD. Currently, the Housing Department does not oversee any public housing complexes in the greater City of Douglas area, but does administer HCV Section 8 rental assistance and homeownership programs.

MA-30 Homeless Facilities and Services – 91.210(c)

INTRODUCTION

The capacity to coordinate systems of care beyond sheltering, healthcare, mental health counseling, employment, etc., and the ability to follow a case through myriad providers to ensure that individual or family is transitioned out of homelessness is critical to the success of homeless services. Since the needs of homeless persons are complex and require a wide range of specialized services, the City does not possess the resources to address this problem. The City of Douglas continues to rely upon other entities and agencies to provide services such as housing, mental health counseling, employment training, and case work services. There is one homeless shelter within Douglas, but the majority of the services for the homeless are located in Bisbee.

TABLE 40: FACILITIES AND HOUSING TARGETED TO HOMELESS HOUSEHOLDS

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	24	0	-	-	-
Households with Only Adults	-	-	-	-	-
Chronically Homeless Households	-	-	-	-	-
Veterans	-	-	-	-	-
Unaccompanied Youth	-	-	-	-	-

Data Source: HUD Continuum of Care Point-In-Time Surveys, November 26, 2018

Table 40 – Facilities and Housing Targeted to Homeless Households

DESCRIBE MAINSTREAM SERVICES, SUCH AS HEALTH, MENTAL HEALTH, AND EMPLOYMENT SERVICES TO THE EXTENT THOSE SERVICES ARE USED TO COMPLEMENT SERVICES TARGETED TO HOMELESS PERSONS

The City has only a limited number of services, and only one homeless shelter, which serves abused women and children and boys under the age of 18 with their mothers. This organization, House of Hope, provides shelter, food, some clothing, transportation to appointments, support groups, advocacy support and referrals to other agencies in the community.

Medical/Healthcare Resources

- ***Southeastern Arizona Behavioral Health Services (936 F Ave #B, Douglas)*** – Provides high-quality integrated care to improve the health, wellness, and quality of life for people who are mentally, behaviorally, or physically ill.

Mental Health Resources

- ***Southeastern Arizona Behavioral Health Services (936 F Ave #B, Douglas)*** – Provides high-quality integrated care to improve the health, wellness, and quality of life for people who are mentally, behaviorally, or physically ill.

- ***Pinal Hispanic Council (1930 & 1940 N 11th St., Douglas)*** – PHC provides services to help diagnose and treat mental health issues and substance abuse problems. Treatment available for depression, anxiety, grief, OCD, alcohol abuse, drug abuse, anger management, family conflicts, domestic violence, and child behavior problems.
- ***Community Health Associates (1701 North Douglas Avenue, Douglas)*** – Offers services related to mental illness recovery, psychiatric health, Road to Recovery, and other individual and family services.

Employment Resources

- ***Southeastern Arizona @ Work (515 East 7th St, Douglas)*** – Offers assistance in finding employment, as well as offers employers assistance in meeting their workforce needs.

LIST AND DESCRIBE SERVICES AND FACILITIES THAT MEET THE NEEDS OF HOMELESS PERSONS, PARTICULARLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH. IF THE SERVICES AND FACILITIES ARE LISTED ON SCREEN SP-40 INSTITUTIONAL DELIVERY STRUCTURE OR SCREEN MA-35 SPECIAL NEEDS FACILITIES AND SERVICES, DESCRIBE HOW THESE FACILITIES AND SERVICES SPECIFICALLY ADDRESS THE NEEDS OF THESE POPULATIONS.

As noted in the preceding response, the City possesses limited services for the homeless. However, the Cochise County Resources Guide lists several organizations and agencies that provide food, clothing, financial assistance, healthcare and transportation assistance. These include State and county agencies, and organizations such as the St. Vincent DePaul Society and the Douglas ARC.

- ***Bisbee Coalition for the Homeless (509 Romero St, Bisbee)***– Provides shelter for men, women, and families who are homeless. Offers bedding, cleaning products, food, clothing, and other donation programs.
- ***Good Neighbor Alliance, Inc. (420 N 7th Street, Sierra Vista)*** – Provides emergency shelter for people who are homeless.
- ***House of Hope (2105 N Washington Ave, Douglas)*** – A non-profit organization that offers homeless services
- ***Douglas Area Food Bank (660 G Ave, Douglas)*** – A food bank, soup kitchen and shelter for homeless and low-income people in need.

MA-35 Special Needs Facilities and Services – 91.210(d)

INTRODUCTION

This section describes facilities and services that assist persons who are not homeless but require supportive housing and programs. These populations may include elderly and frail elderly, persons with disabilities, persons with alcohol or drug addictions, persons with HIV/AIDS, or other groups. Such facilities and services include units that are barrier-free and physically accessible, units with on-site supportive services such as case management, counseling and healthcare, and units that are affordable to persons on a fixed or limited income.

The City has a limited range of facilities and services to assist persons and families with special needs. These include the Douglas Family Health Clinic, the Douglas Area Food Bank, Inc. and the Douglas Saint Vincent de Paul Society. These organizations provide financial assistance, counseling, meals and food, and other aid. Additional services are available in other communities in the area.

INCLUDING THE ELDERLY, FRAIL ELDERLY, PERSONS WITH DISABILITIES (MENTAL, PHYSICAL, DEVELOPMENTAL), PERSONS WITH ALCOHOL OR OTHER DRUG ADDICTIONS, PERSONS WITH HIV/AIDS AND THEIR FAMILIES, PUBLIC HOUSING RESIDENTS AND ANY OTHER CATEGORIES THE JURISDICTION MAY SPECIFY, AND DESCRIBE THEIR SUPPORTIVE HOUSING NEEDS

Please see the above response.

DESCRIBE PROGRAMS FOR ENSURING THAT PERSONS RETURNING FROM MENTAL AND PHYSICAL HEALTH INSTITUTIONS RECEIVE APPROPRIATE SUPPORTIVE HOUSING

Households with mental or physical health issues face barriers to safe, decent and affordable housing. Often, persons with mental or physical issues are discharged from institutions but are then unable to find independent housing that they can afford or reasonably maintain.

Neither the City nor any of the organizations mentioned above are involved in supportive housing for discharged persons.

SPECIFY THE ACTIVITIES THAT THE JURISDICTION PLANS TO UNDERTAKE DURING THE NEXT YEAR TO ADDRESS THE HOUSING AND SUPPORTIVE SERVICES NEEDS IDENTIFIED IN ACCORDANCE WITH 91.215(E) WITH RESPECT TO PERSONS WHO ARE NOT HOMELESS BUT HAVE OTHER SPECIAL NEEDS. LINK TO ONE-YEAR GOALS. 91.315(E)

The City will consider pursuing activities to address the housing and supportive service needs of persons who are not homeless, but have other special needs. However, at this time, the city does not have the procedures, policies or mechanisms in place to assist organizations providing these types of services.

FOR ENTITLEMENT/CONSORTIA GRANTEEES: SPECIFY THE ACTIVITIES THAT THE JURISDICTION PLANS TO UNDERTAKE DURING THE NEXT YEAR TO ADDRESS THE HOUSING AND SUPPORTIVE SERVICES NEEDS IDENTIFIED IN ACCORDANCE WITH 91.215(E) WITH RESPECT TO PERSONS WHO ARE NOT HOMELESS BUT HAVE OTHER SPECIAL NEEDS. LINK TO ONE-YEAR GOALS. (91.220(2))

Please see above response.

MA-40 Barriers to Affordable Housing – 91.210(e)

DESCRIBE ANY NEGATIVE EFFECTS OF PUBLIC POLICIES ON AFFORDABLE HOUSING AND RESIDENTIAL INVESTMENT.

This section requires the jurisdiction to explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment. City of Douglas has several strategies that it utilizes to remove or ameliorate the negative effects of public policies that are barriers to affordable housing. In general, the City's policies are favorable to affordable housing providers.

Douglas does not put any limitations on growth. Through vehicles such as zoning ordinances, subdivision controls, permit systems, and housing codes and standards, the City has attempted to ensure the health, safety, and quality of life of its residents while minimizing the barriers that may impede the development of affordable housing.

The most important impediment to affordable housing revolves around the lack of Federal and State resources for affordable housing initiatives. The lack of programs and resources to reduce excessive rent or mortgage burdens to qualified persons is a key factor.

Despite the recent downturn in the housing market nationally and locally, housing prices, both purchase and rental, remain relatively high, especially for lower income households.

The Housing Needs Assessment also noted that stringent criteria in the mortgage origination process due to the foreclosure crisis, have made ownership increasingly difficult for persons at all income levels. This factor is outside the scope and control of City policy. In some instances, issues revolving around personal finances (lack of down payment, credit history, employment history) affect the availability of affordable housing for Douglas residents.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

INTRODUCTION

The Consolidated Plan provides a concise summary of the City’s priority non-housing community development needs that are eligible for assistance. The following section describes the economic development needs of City of Douglas.

This section also provides data regarding the local economic condition of the jurisdiction and compares the ability of the local work force to satisfy the needs of local businesses. Much of this data can be used to describe the level of housing demand in the local market. The City's economic development needs center upon obtaining new jobs and providing the workforce to take those jobs. Education and job training (and retraining) are crucial to having a competitive workforce. At the same time, the City needs to make some investments in infrastructure to be competitive in attracting new businesses.

This section discusses the following topics:

- Business by Sector
- Labor Force
- Occupations by Sector
- Travel Time to Work
- Educational Attainment
- Median Earnings in the Past 12 Months
- Additional Narrative

ECONOMIC DEVELOPMENT MARKET ANALYSIS

TABLE 41: BUSINESS ACTIVITY

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
			%	%	%
Agriculture, Mining, Oil & Gas Extraction	47	4	2%	1%	-1%
Arts, Entertainment, Accommodations	275	368	9%	14%	5%
Construction	163	30	5%	1%	-4%
Education and Health Care Services	862	732	28%	29%	1%
Finance, Insurance, and Real Estate	62	61	2%	2%	0%
Information	29	35	1%	1%	0%
Manufacturing	122	0	4%	0%	-4%
Other Services	99	96	3%	4%	1%
Professional, Scientific, Management	301	26	10%	1%	-9%
Public Administration	569	399	18%	16%	-2%
Retail Trade	422	645	13%	25%	12%
Transportation and Warehousing	122	98	4%	4%	0%
Wholesale Trade	37	57	1%	2%	1%
Total	3,110	2,551	100%	100%	--

Data Source: 2013-2017 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Universe: Civilian Employed Population 16 years and over

Table 41 – Business Activity

Information provided in **Table 41** identifies workers and jobs within City of Douglas by sector. This information is divided into 13 sectors by number of workers, number of jobs and then calculations of the ratio of workers to jobs by business sector. According to 2013-2017 ACS, there are 3,110 workers within all business sectors identified in City of Douglas. The number of jobs within all sectors is estimated to be 2,551 according to 2015 Longitudinal Employer-Household Dynamics data published by the U.S. Census Bureau.

The largest percentages of workers are within the Education and Healthcare Services (28%) and Public Administration (18%). Workers in the Retail Trade sector comprise 13% and workers in the Professional, Scientific, and Management Services sector comprise 10%. Workers in the Wholesale Trade (1%) and Information (1%) sectors comprise the smallest percentage of workers.

The largest share of jobs is within the Education and Health Care Services sector (29%), and Retail Trade sector (25%). Jobs in Public Administration (16%), and the Arts, Entertainment, and Accommodations

(14%) sectors are also well-represented. The following sectors account for the smallest share of jobs available: Manufacturing (less than 1%); Agriculture, Mining, Oil, & Gas Extraction (1%); Construction (1%); Information (1%); and Professional, Scientific, and Management Services (1%).

By comparing the share of workers to share of jobs, it can be determined within which sectors there are deficiencies to be addressed. The data above identifies the “jobs less workers.” This is determined by the percentage of jobs less the percentage of workers. A negative number reflects an oversupply of labor for the sector. As **Table 41** shows, within City of Douglas there are fewer jobs than workers within five (5) business sectors: Professional, Scientific and Management; Manufacturing; Public Administration; Construction; and Agriculture, Mining, Oil and Gas Extraction. This means that workers in these business sectors may have more difficulty finding a job that matches their skillset. In contrast, there may be more jobs than workers in five (5) business sectors: Education and Health Care Services; Wholesale Trade; Retail Trade; Other Services; and Arts, Entertainment, and Accommodations. This means it is likely that workers from outside the City of Douglas are meeting the needs of these sectors because there are not enough skilled workers within the City of Douglas.

TABLE 42: LABOR FORCE

Total Population in the Civilian Labor Force	3,526
Civilian Employed Population 16 years and over	3,526
Unemployment Rate	11.8%
Unemployment Rate for Ages 16-24	22.0%
Unemployment Rate for Ages 25-65	8.3%

Data Source: 2013-2017 ACS

Table 42 – Labor Force

Table 42 portrays the labor force within City of Douglas. According to the 2013-2017 ACS the total population within the City in the civilian labor force is 3,526. This number includes the number of civilian workers plus those actively seeking employment and does not include those who are not actively seeking employment.

The number of the civilian population 16 years and over who are employed totals 3,526. At the time of the 2000 U.S. Census, the City’s unemployment rate was only 5.3%. According to 2013-2017 ACS estimates, the City’s unemployment rate is approximately 11.8%, a decrease from the 2008-2012 ACS

estimates of 12.3%. The average unemployment rate for ages 16-24 is nearly double than the rate for the City as a whole. The average unemployment rate for those between the ages of 16-24 is 22.0% while for ages 25-65 the average unemployment rate is approximately 8.3%.

TABLE 43: OCCUPATIONS BY SECTOR

Occupations by Sector	Number of People*	Median Earnings
Management, business and financial	750	\$38,387
Service	1,189	\$36,117
Sales and office	695	\$20,938
Natural resources, construction, extraction, maintenance	194	\$34,886
Production, transportation and material moving	282	\$14,815

Data Source: 2013-2017 ACS

**Universe: Civilian employed population 16 years and over.*

Table 43 – Occupations by Sector

Table 43 identifies Occupations by Sector within City of Douglas according to the 2013-2017 ACS. Service occupations account for the largest number of occupations with 1,189 people. Sales and Office (695), and Management, business and financial occupations (750) are also well-represented. The least represented occupations in City of Douglas are Natural resources, construction, and maintenance (194). Of these occupations, median earnings are highest in the Management, business and financial occupations (\$38,387), whereas median earnings are lowest in the Production, transportation, and material moving occupations (\$14,815).

TABLE 44: TRAVEL TIME

Travel Time	Number*	Percentage
< 30 Minutes	2,459	85%
30-59 Minutes	300	10%
60 or More Minutes	152	5%
Total	2,911	100%

Data Source: 2013-2017 ACS

**Universe: Workers 16 years and over who did not work at home.*

Table 44 – Travel Time

As shown in **Table 44**, most City of Douglas residents commute less than 30 minutes to work (85%). A notable percentage travel 30-59 minutes (10%) with a small percentage commuting more than one hour (5%). Seventy-one percent of City of Douglas workers drive to work alone and 17.8% carpool. According

to 2013-2017 ACS estimates, for those who commute to work, the average travel time is 15.6 minutes one-way.

TABLE 45: EDUCATIONAL ATTAINMENT BY EMPLOYMENT STATUS (POPULATION 16 AND OLDER)

Educational Attainment*	In Labor Force		Not in Labor Force
	Civilian	Unemployed	
Less than high school graduate	459	83	2,196
High school graduate (includes equivalency)	724	55	2,102
Some college or Associate's degree	1,004	67	2,641
Bachelor's degree or higher	596	33	238

Data Source: 2013-2017 ACS

**Universe: Population 25 to 64 years*

Table 45 – Educational Attainment by Employment Status

Table 45 displays Educational Attainment by Employment Status for the population between the age of 25 and 64 years. Within City of Douglas, the highest numbers of employed are those with some college or an associate degree (1,004), and high school graduates (724). A significant number of employed also have a bachelor’s degree or higher. Approximately 16.5% of the civilian employed population never graduated from high school.

The highest numbers of unemployed are also those persons who did not graduate high school (83) followed by those with some college or an associate degree (67). Approximately 13.8% of the unemployed population has a bachelor’s degree or higher.

When looking at the civilian labor force ages 25-65 years, 2,783 are employed, 238 are unemployed, and 7,177 are not in the labor force and are not actively seeking employment.

TABLE 46: EDUCATIONAL ATTAINMENT BY AGE

	Age*				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	109	189	287	423	507
9th to 12th grade, no diploma	540	822	431	503	165
High school graduate, GED, or alternative	660	1,292	682	852	283
Some college, no degree	521	1,164	1,108	674	246
Associate's degree	55	202	190	307	52
Bachelor's degree	51	252	173	128	122
Graduate or professional degree	0	41	41	128	83

Data Source: 2013-2017 ACS

**Universe: Population age 18 years and over*

Table 46 – Educational Attainment by Age

Table 46 shows Educational Attainment by Age. A significant population over the age of 18 (2,461 or 14.8%) in City of Douglas did not graduate from high school. Nearly half of adults (7,482 or 45%) graduated from high school or have some college education but no college degree. Combined, nearly 60% of the population 18 years or older (9,943 adults) do not have a college degree.

TABLE 47: EDUCATIONAL ATTAINMENT – MEDIAN EARNINGS IN THE PAST 12 MONTHS

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$10,120
High school graduate (includes equivalency)	\$12,410
Some college or Associate's degree	\$16,526
Bachelor's degree	\$37,520
Graduate or professional degree	\$41,346

Data Source: 2013-2017 ACS

**Universe = Population 25 years and over*

Table 47 – Median Earnings in the Past 12 Months

Table 47 identifies income over a 12-month period as it relates to educational attainment in City of Douglas. The data shown is based on 2013-2017 ACS estimates. Greater educational attainment strongly correlates with increased income over a 12-month period. In City of Douglas, persons having a graduate or professional degree have an estimated median income of \$41,346 and persons having a bachelor's degree have a median income of \$37,520. In contrast, persons with some college or an associate degree have a median income of \$16,526. Similarly, those having a high school diploma or equivalency have a

median income of \$12,410 and those without a high school diploma or equivalency have a median income of \$10,120.

BASED ON THE BUSINESS ACTIVITY TABLE ABOVE, WHAT ARE THE MAJOR EMPLOYMENT SECTORS WITHIN YOUR JURISDICTION?

The City’s major employment sectors are Education and Healthcare services, and Public administration. Other sectors, such as Professional/Management, and Retail Trade are also well represented. Combined, these employment sectors represent approximately 70% of all workers and jobs in City of Douglas.

DESCRIBE THE WORKFORCE AND INFRASTRUCTURE NEEDS OF THE BUSINESS COMMUNITY:

The greatest need for the City in terms of economic development is the creation or attraction of new jobs for City residents that pay a living wage. However, these jobs can only be created if there is an adequate, trained workforce in place to fill them. To this end the City supports education and job training programs, and the assisting young persons in the development of life skills, though the City lacks resources to undertake or financially support such programs.

The earnings figures in **Table 45** show what is commonly known - that the higher one's level of education, the greater one's earnings. Unfortunately, in Douglas the educational attainment level of many residents is very low as shown in **Table 44** – 1,008 persons in the working age cohorts (18 - 65) have less than a 9th grade education and another 2,296 in these cohorts have a ninth to twelfth grade education, but no diploma. These persons represent approximately 30 percent of the workforce.

The City’s infrastructure is older and in need of maintenance and upgrades to make the City attractive for business expansion and development.

DESCRIBE ANY MAJOR CHANGES THAT MAY HAVE AN ECONOMIC IMPACT, SUCH AS PLANNED LOCAL OR REGIONAL PUBLIC OR PRIVATE SECTOR INVESTMENTS OR INITIATIVES THAT HAVE AFFECTED OR MAY AFFECT JOB AND BUSINESS GROWTH OPPORTUNITIES DURING THE PLANNING PERIOD. DESCRIBE ANY NEEDS FOR WORKFORCE DEVELOPMENT, BUSINESS SUPPORT OR INFRASTRUCTURE THESE CHANGES MAY CREATE.

The City of Douglas developed a Downtown Revitalization Plan in 2008. This plan guides and provides strategies for economic development and investment in downtown Douglas. The City of Douglas

encourages economic investment and seeks to facilitate business development, and mixed-use housing development to promote growth and job access.

HOW DO THE SKILLS AND EDUCATION OF THE CURRENT WORKFORCE CORRESPOND TO EMPLOYMENT OPPORTUNITIES IN THE JURISDICTION?

Within nine (9) business sectors there is a potential oversupply of labor. Agriculture, Mining, Oil and Gas Extraction; Construction; Education and Health Services; Finance/Insurance, and Real Estate; Manufacturing; Professional/Scientific Management; Public Administration; Transportation and Warehousing; and Other Services are business sectors where there are more workers than jobs. This means that workers in these business sectors may have more difficulty finding a job that matches their skillset.

Within City of Douglas there are fewer workers than jobs within four (4) sectors: Arts, Entertainment, and Accommodations; Information; Retail Trade; and Wholesale Trade. This means that workers from outside of City of Douglas may be meeting the employment needs of these business sectors because there are not enough skilled workers with the City.

Though the City has an abundant labor force, the educational and training level of that workforce does not match the needs of many of today's industries and businesses. The City's employment opportunities are somewhat limited, and in some measure, it is the quality of the labor force that limits those opportunities.

DESCRIBE ANY CURRENT WORKFORCE TRAINING INITIATIVES, INCLUDING THOSE SUPPORTED BY WORKFORCE INVESTMENT BOARDS, COMMUNITY COLLEGES AND OTHER ORGANIZATIONS. DESCRIBE HOW THESE EFFORTS WILL SUPPORT THE JURISDICTION'S CONSOLIDATED PLAN.

The Arizona Workforce Connection aids persons seeking employment in Douglas, and the Small Business Development Center of Cochise College as recently received a grant to provide cyber-security training to youth. These programs are the key element in the City's efforts to eliminate poverty and create jobs.

DOES YOUR JURISDICTION PARTICIPATE IN A COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY (CEDs)?

The Southeast Arizona Council of Government has prepared and updates a CEDs for the Southeast Arizona Economic Development District. Douglas is a member of the organization and participates in the CEDs to a limited degree.

IF SO, WHAT ECONOMIC DEVELOPMENT INITIATIVES ARE YOU UNDERTAKING THAT MAY BE COORDINATED WITH THE CONSOLIDATED PLAN? IF NOT, DESCRIBE OTHER LOCAL/REGIONAL PLANS OR INITIATIVES THAT IMPACT ECONOMIC GROWTH.

The City's revitalization efforts, while focusing on the needs of the City, are in consonance with the objectives of the CEDs.

DISCUSSION

According to the 2013-2017 ACS, the City of Douglas labor force is comprised of approximately 3,110 people, of which approximately 82% are employed and 18% are unemployed. The largest employment sectors in City of Douglas are Education and Health Care Services; Public Administration; and Retail Trade.

Like in most cities, higher median earnings generally correlate with higher education. The highest median earnings in City of Douglas are in occupations such as management, business and financial, while the lowest median earnings are in Production, Transportation, and Material Moving. About 28% of City of Douglas's adult population has a high school diploma or equivalent, but only 7.7% of the City's population has a Bachelor's, graduate or professional degree. While there may be a need for workforce training, there are also several workforce training initiatives in the community to meet this need.

Approximately 85% of City of Douglas's population drives less than 30 minutes to get to work, and approximately 95% of City of Douglas's population drives less than one hour to get to work. This means that most employees live locally or within the Southeastern Arizona region.

MA-50 Needs and Market Analysis Discussion

ARE THERE AREAS WHERE HOUSEHOLDS WITH MULTIPLE HOUSING PROBLEMS ARE CONCENTRATED? (INCLUDE A DEFINITION OF "CONCENTRATION")

Eligible block groups having a population of 51% or more low- and moderate-income persons (i.e., areas of low- and moderate-income concentration) are typically the same areas that are also disproportionately affected by housing problems, such as overcrowding, substandard conditions, or significant cost burden.

According to the HUD CPD Maps tool, the following Census Tracts have concentrations of housing problems (i.e., more than half of extremely low-income, low-income, or moderate-income households residing therein have some type of housing problem).

TABLE 48: CONCENTRATIONS OF HOUSEHOLDS WITH HOUSING PROBLEMS

% of Households w/Housing Problems	Extremely Low-Income Households	Low-Income Households	Moderate Income Households
50-75%	7, 8	7, 8	None
>75%	None	None	None

Source: HUD CPD Maps, Accessed June 2019

Table 48 – Concentrations of Households with Housing Problems

Because of the age of the City of Douglas’s housing stock, housing problems are distributed throughout the City’s limits. Geographically, housing problems affecting extremely low-income households are the most widespread. More than half of extremely low-income households have some type of housing problem, regardless of their location. Housing problems affecting low-income households are most concentrated in the same census tracts as extremely low-income households. Fewer than half of moderate-income households have housing problems and these households are not concentrated in any area.

ARE THERE ANY AREAS IN THE JURISDICTION WHERE RACIAL OR ETHNIC MINORITIES OR LOW-INCOME FAMILIES ARE CONCENTRATED? (INCLUDE A DEFINITION OF "CONCENTRATION")

The lowest income areas of City of Douglas are most affected by housing problems and in need of community investment. Unfortunately, these areas are widespread. Five of the City's Six Census Tracts have a low- and moderate-income population of 51% or greater.

The following Block Groups have populations where ethnic minorities comprise 20% or more of the population:

- Census Tract 6, Block Group 1 (56% low/mod); 57% Hispanic/Latino
- Census Tract 6, Block Group 2 (71% low/mod); 91% Hispanic/Latino
- Census Tract 7, Block Group 1 (65% low/mod); 95% Hispanic/Latino
- Census Tract 8, Block Group 2 (70% low/mod); 89% Hispanic/Latino
- Census Tract 8, Block Group 4 (65% low/mod); 94% Hispanic/Latino
- Census Tract 9.01, Block Group 1 (85% low/mod); 100% Hispanic/Latino
- Census Tract 9.01, Block Group 2 (74% low/mod); 98% Hispanic/Latino
- Census Tract 9.01, Block Group 3 (73% low/mod); 100% Hispanic/Latino
- Census Tract 9.01, Block Group 4 (79% low/mod); 96% Hispanic/Latino
- Census Tract 9.02, Block Group 1 (72% low/mod); 90% Hispanic/Latino
- Census Tract 9.02, Block Group 2 (75% low/mod); 87% Hispanic/Latino
- Census Tract 9.02, Block Group 3 (60% low/mod); 75% Hispanic/Latino

[Source: 2013-2017 ACS Data, U.S. Census Bureau TIGER/Line GIS Data]

Many of these tracts are also areas of low- and moderate-income concentration. For example, the greatest concentration of ethnic minorities in City of Douglas is in Census Tract 9.01, Block Group 1 (100% Black/African American). Census Tract 408 also has a population of 85% low- and moderate-income persons. The City of Douglas has few concentrations of racial minorities. Hispanic or Latino persons generally comprise most of the population citywide.

Although concentrations exist, the data provided in the Market Analysis show that all racial and ethnic groups living in the City have significant housing needs, particularly for housing repairs, rehabilitation and accessibility retrofits.

WHAT ARE THE CHARACTERISTICS OF THE MARKET IN THESE AREAS/NEIGHBORHOODS?

In general, these neighborhoods are characterized by older housing, often in need of repair or renovation. Single-family owner units are available at relatively low prices, but the market is weak because of the need for extensive and expensive renovation in many of the structures, as well as stricter loan standards and higher down payment requirements that limit the number of potential buyers. More affluent buyers will tend to favor newer construction in other more attractive neighborhoods.

The rental market in these neighborhoods is strong in the face of increased demand, especially for more modern or better kept buildings. Rents tend to increase, even for poorer buildings, exacerbating the cost burden issue for low-income households.

In general, there are few businesses or amenities, and there are limited opportunities for food shopping.

ARE THERE ANY COMMUNITY ASSETS IN THESE AREAS/NEIGHBORHOODS?

Like many communities, the community itself is a strong asset for economic development. Organization at the community-level combined with other means, including CDBG assistance, is the primary asset for positive change in City of Douglas's low- and moderate-income neighborhoods. The City has other assets such as the City general fund to fund activities.

The City has worked very hard to maintain and improve housing conditions, and to provide community facilities and infrastructure in the low/mod neighborhoods. As noted, the needs are great and diverse and the resources available are limited. The City has historically used its CDBG resources across these neighborhoods, rehabilitating homes and improving streets, sidewalks, and streetscapes.

ARE THERE OTHER STRATEGIC OPPORTUNITIES IN ANY OF THESE AREAS?

Strategic financial support of commercial façade improvements, sidewalk and street improvements, blight elimination activities, and facility improvements may benefit these areas the most.

SP-05 Overview

STRATEGIC PLAN OVERVIEW

The Consolidated Plan process requires the City to identify priority needs and a Strategic Plan to meet those needs over the next five years. For every priority, there are goals and objectives established to measure progress, as well as strategies to address them. There are essentially four major topics of focus in the Consolidated Plan:

- Housing, including Fair Housing
- Homelessness
- Community Development
- Non-Homeless Special Needs

Public Facility and Infrastructure Needs

The Public Facility and Infrastructure Needs is focused on streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, utility lines, and aesthetic amenities on public property such as trees, sculptures, pools of water and fountains, and other works of art. The regulations specify that facilities that are designed for use in providing shelter for persons having special needs are considered to be public facilities (and not permanent housing), and thus are covered under this category of basic eligibility. Such shelters would include nursing homes, convalescent homes, hospitals, shelters for victims of domestic violence, shelters and transitional facilities/housing for the homeless, halfway houses for run-away children, drug offenders or parolees, group homes for the developmentally disabled, and shelters for disaster victims. Based on input and data received through the public involvement process, the highest priorities identified by the public and the City are:

- Public Facility and Infrastructure Improvements
- Public Facility improvements and upgrades
- ADA accessibility to public facilities and amenities
- Park Improvements

- Economic Development

Considering these priorities, the following goals and objectives have recommended:

Goal: Public Facility and Infrastructure Improvements

Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure.

Provision of Needed Services

Provision of Needed Services is a broad category that applies to public service-oriented needs for any population that is presumed to be low- and moderate-income and in need of public services. The category covers a large population, including the mentally ill, developmentally disabled, elderly, and other groups. These specific services are often provided by non-profit agencies, usually in coordination with the City of Douglas or Cochise County.

Based on input and the data received through an extensive public involvement process, the highest priorities identified by the public are:

- Homeless Services and Prevention
- Health and Public Service programs for the elderly
- Fair Housing
- Needed services for low- and moderate-income households
- Senior Services

Considering these priorities, the following draft goals and objectives are recommended:

Goal: Provision of Needed Services

Provide needed services for low- and moderate-income (LMI) and special needs populations assumed to be LMI.

SP-10 Geographic Priorities

GENERAL ALLOCATION PRIORITIES

Describe the basis for allocating investments geographically within the City.

The City of Douglas has designated low- and moderate-income geographic areas with the largest percentage of households in poverty as potential areas of focus. The Community Block Grant Development (CDBG) program requires that each CDBG-funded activity must either principally benefit low- and moderate-income persons, aid in the prevention or elimination of slums or blight or meet a community development need having a particular urgency. With respect to activities that benefit all the residents of a given area, at least 51% of the area's residents must be low and moderate income.

Some CDBG assisted activities, such as parks, facilities, community centers and streets, serve an identified geographic area. These activities generally meet the low- and moderate-income principal benefit requirement if 51 percent of the residents in the activity's service area are low and moderate income. Of 17 Census Block Groups within the City, 12 have a low- and moderate-income percentage of 51% or more. It should be noted, that the overall low- and moderate-income percentage for the entire City of Douglas is 63.16 percent per the FY 2019 Overall Low- and Moderate-Income Summary Data, Based on 2011-2015 American Community Survey

The CDBG Eligible Areas Map shows the areas included. Each of these areas meets the eligibility requirements for low- and moderate-income benefit. (see **Map 1** and **Table 49**).

Over the next five years, the City estimates a substantial portion of CDBG funds to be used on infrastructure and facility improvements.

TABLE 49: GEOGRAPHIC AREA

1. Area Name: Low- and Moderate-Income Areas
Area Type: All are low/mod neighborhoods as defined by HUD
Identify the neighborhood boundaries for this target area. The City of Douglas has many low- and moderate-income census block groups throughout the City. These areas are defined as Census Block Groups with a low- and moderate-income population of 51% or more. 12 of the City's 17 block groups meet the minimum threshold and the overall low- and moderate-income percentage for the City is 63.16%.
Include specific housing and commercial characteristics of this target area. In each of these neighborhoods the housing stock is typically older, often in need of repair or renovation. In general, there are few businesses or amenities.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area? Throughout the public participation process the areas defined as low- and moderate-income areas were identified as areas that needed infrastructure and facilities improvements. These areas have been areas of concern in the past and emerged in the course of examining the data.
Identify the needs in this target area. Needs identified include development of affordable housing, housing rehabilitation for both owner and renter units, rental assistance for extremely low-income households threatened with homelessness, infrastructure improvements, programs for youth, and assisting the homeless.
What are the opportunities for improvement in this target area? The City can keep residents in safe, affordable housing and prevent additional persons and families from becoming homeless. Second, the City can improve the quality of life by revitalizing these neighborhoods economically and in their appearance.
Are there barriers to improvement in this target area? One of the greatest barriers to improvements the amount of effort and resources needed to provide the necessary assistance.

Table 49 – Geographic Priority Areas

SP-25 Priority Needs

The Five-Year Consolidated Plan must indicate the general priorities for allocating investment of available resources among different needs. Priority needs are those that will be addressed by the goals outlined in the Strategic Plan. For each priority, the City of Douglas has indicated one or more populations to be served, as well as an assigned priority level indicating relative importance among the needs listed (see **Table 50**).

TABLE 50: PRIORITY NEEDS SUMMARY

Priority Need Name	Priority Level	Population	Geographic Areas	Goals Addressing
Affordable Housing				
Provide Affordable Housing Opportunities, including Rental Assistance, Homeowner Rehabilitation	Low	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Elderly, Large Families, Families with Children, Persons with Physical Disabilities	Citywide	Provision of Needed Services
Fair Housing	Low	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities	Citywide	Provision of Needed Services
Rental Acquisition and Rehabilitation; New Rental Construction	Low	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Large Families, Families with Children, Elderly	Citywide	Provision of Needed Services
Homelessness				
Homeless Activities, including Homeless Prevention, Emergency Shelters, and Transitional Housing	Low	Chronic Homelessness, Homeless - Individuals, Homeless Families with Children, Homeless Mentally Ill, Chronic Substance Abuse - Homeless, veterans - Homeless, Persons with HIV/AIDS - Homeless, Victims of Domestic Violence- Homeless, Unaccompanied Youth - Homeless	Citywide	Provision of Needed Services

Non-Housing Community Development				
Economic Development, including job training	Low	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI)	Citywide	Provision of Needed Services
Public Improvements/Infrastructure	High	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Large Families, Families with Children, Elderly, Persons with Physical Disabilities	Citywide	Public Facility and Infrastructure Improvements
Public Facilities	High	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Large Families, Families with Children, Elderly, Persons with Physical Disabilities	Citywide	Public Facility and Infrastructure Improvements
Non-Homeless Special Needs				
Public Service Programs, especially for the Elderly, and for Healthcare	Low	Extremely Low Income (30% AMI), Low Income (50% AMI), Moderate Income (80% AMI), Large Families, Families with Children, Elderly, Frail Elderly	Citywide	Provision of Needed Services

Table 50 – Priority Needs Summary

NARRATIVE (OPTIONAL)

Public Improvements and Infrastructure receive a High ranking here because they are a means to make significant improvements in the quality of life in the distressed neighborhoods. With proper planning and coordination, the City can leverage CDBG funds with both the State and other federal programs to provide the funds needed for these projects.

While the City supports programs for affordable homeownership, the opportunities for homeownership among the City’s low-income residents are limited by the poor economy, job uncertainty, strict lending criteria and significant down payment requirements.

Because of the lack of resources to support many public services the provision of Public Service Programs receives a low priority rank. The need for a wide range of services, including programs for seniors and youth, feeding programs, and childcare, is present in the City which does not preclude the

City from funding services in the future. However, the City must develop the necessary policies, procedures and capacity to receive applications, make selections, and monitor activities before undertaking projects in this area.

SP-30 Influence of Market Conditions

The Five-Year Consolidated Plan must describe how the characteristics of the housing market influenced the City’s decisions regarding allocation priorities amongst the types of housing assistance (see **Table 51**).

TABLE 51: INFLUENCE OF MARKET CONDITIONS

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	According to the Housing Needs Assessment and the Housing Market Study the greatest housing problem in Douglas is cost burden, and many of the households in the lowest income categories are severely cost burdened. Rental assistance thus ranks very high among program strategies. Tenant-based vouchers are by far the most common voucher used in Douglas. The average annual income of residents using TBRA is \$9,836. This voucher continues to be critical for persons with extremely low incomes who are severely cost burdened. It is estimated that while approximately 184 TBRA vouchers are in use, nearly 820 households in Douglas have extremely low incomes.
TBRA for Non-Homeless Special Needs	Rental assistance for the non-homeless special needs group will focus on the elderly and extremely low-income small households as these are the two groups that emerged as most vulnerable both from the analysis of data and from discussion in the public meetings. Non-Homeless Special Needs populations have a high need for TBRA, while at the same time being in need of improved accessibility within housing. Approximately 45 disabled families receive assistance while 184 families are requesting assistance. Due to their limited income, housing needs for those with non-homeless special needs include affordability, availability of assistance, accessibility improvements and Fair Housing options.
New Unit Production	The City does not currently envision supporting new unit production because of the limited resources available.
Rehabilitation	Rehabilitation of both owner and renter units in the City’s low-income areas is a High priority as part of the effort to keep households in affordable housing.
Acquisition, including preservation	Because of the limited funds available, the City will not emphasize the acquisition and rehabilitation of rental units.

Table 51 – Influence of Market Conditions

SP-35 Anticipated Resources

The Five-Year Consolidated Plan must identify the federal, state, local and private resources expected to be available to the City to address priority needs and specific objectives identified in the Strategic Plan. These resources are summarized in **Table 52**.

TABLE 52: 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	Admin and Planning; Public Improvements, Public Services	\$173,759	\$0	\$0	\$173,759	\$676,000	Additional resources for leveraging may include City Departments (e.g. Public Works, Parks and Recreation), public or social service providers or other sources of funding.

Table 52 – Anticipated Resources

EXPLAIN HOW FEDERAL FUNDS WILL LEVERAGE THOSE ADDITIONAL RESOURCES (PRIVATE, STATE AND LOCAL FUNDS), INCLUDING A DESCRIPTION OF HOW MATCHING REQUIREMENTS WILL BE SATISFIED.

The City will cultivate funding partners who can match the City's investment of CDBG funds. The City administration recognizes that the City's annual entitlement and formula allocations are not enough to meet all its needs. Additional funds need to be raised to ensure that more infrastructure improvements, affordable housing, and community/public services are available for those in need.

Matching requirements will be satisfied with other eligible financial resources and/or in-kind services, and the City will continue to seek this type of matching as well as financial matches.

The City of Douglas Housing Authority receives HUD funds for the City's Housing Choice Voucher program.

The City uses general fund resources for infrastructure and community service activities on a regular basis, but such funds are becoming increasingly limited in light of other needs and priorities across the City. While the City actively seeks additional funding from a range of sources, many of these sources are applications for highly competitive grants, and there is no assurance of receiving these funds.

IF APPROPRIATE, DESCRIBE PUBLICLY OWNED LAND OR PROPERTY LOCATED WITHIN THE JURISDICTION THAT MAY BE USED TO ADDRESS THE NEEDS IDENTIFIED IN THE PLAN.

The City does not own any property or land that could be used to address the needs identified in this plan.

SP-40 Institutional Delivery Structure

EXPLAIN THE INSTITUTIONAL STRUCTURE THROUGH WHICH THE JURISDICTION WILL CARRY OUT ITS CONSOLIDATED PLAN INCLUDING PRIVATE INDUSTRY, NON-PROFIT ORGANIZATIONS, AND PUBLIC INSTITUTIONS.

Table 53 shows the institutional structure through which the City of Douglas will carry out its Strategic Plan. Although not every organization involved in the program of delivery is included in **Table 53**, the lead agency and other organizations presented show the breadth of delivery capacity within the City.

As noted, the Housing Department is the lead agency for Consolidated Plan activities. However, as the program continues to develop, program delivery may be conducted through government agencies and private sector organizations. The Housing Department will prepare and distribute the application for funding, conduct outreach efforts to the community about the programs, provide technical assistance to applicants in the competitive application process, and evaluate applications and make recommendations for activity funding for City Council approval.

The outreach efforts target both organizations and institutions that have previously received funding, and those that have not. The Housing Department will make a conscious effort to avoid duplication of services and delivery systems. The Department will seek to strengthen its service providers and to build capacity so that these organizations can become more financially independent and better leverage and use resources.

TABLE 53: INSTITUTIONAL DELIVERY STRUCTURE

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Douglas City Council	Government Agency	Review and Approval	Citywide
City of Douglas Housing Department (PHA)	Government Agency	Affordable Housing; HCV; Planning; Public Housing	Low/Mod. Income Areas; Local Target Areas
City of Douglas Public Works Department	Government Agency	Community Development - Facilities & Improvements	Citywide
Catholic Community Services of Southern Arizona	Non-Profit Agency	House of Hope – Emergency Shelter	Citywide
City of Douglas Leisure Services	Government Agency	Community Development - Facilities & Improvements	Citywide
Arizona Balance of State Continuum of Care	Continuum of Care	Homelessness/ Non-Homeless Special Needs	Region/State
Cochise County	Government Agency	Public Housing; Homelessness; Non-Homeless Special Needs; Economic Development	Region

Table 53 – Institutional Delivery Structure

ASSESS THE STRENGTHS AND GAPS OF THE INSTITUTIONAL DELIVERY STRUCTURE

The City of Douglas continues to build its Institutional Delivery System. A wide range of services are available in the community, including homelessness prevention services, street outreach services, supportive services, and other services such as nutrition programs and youth programs (see **Table 54**). These programs are provided by nonprofit organizations and other agencies.

The strength of the delivery system is based upon the ample amount of resources in the community and locally within the County to perform most tasks to be undertaken by CDBG. As a participant in the state CDBG program, the City has developed relationships and contacts with several service providers, not-for-profit organizations, housing developers and lenders, and agencies at the state, regional and local levels. The Housing Department understands its role in the delivery system and will work to develop and formalize an organized and effective delivery system including as many of the entities responsible for program delivery as possible.

TABLE 54: AVAILABILITY OF SERVICES TARGETED TO HOMELESS PERSONS AND PERSONS WITH HIV AND MAINSTREAM SERVICES

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Food Banks/Nutrition Programs	X	X	X
Youth Programs	X	X	X

Table 54 – Homeless Prevention Services Summary

DESCRIBE HOW THE SERVICE DELIVERY SYSTEM INCLUDING, BUT NOT LIMITED TO, THE SERVICES LISTED ABOVE MEET THE NEEDS OF HOMELESS PERSONS (PARTICULARLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH)

At present the City is does not directly support or coordinate the local homeless program delivery system. Going forward, the City will use a variety of programs and partners to first prevent low-income persons from becoming homeless and, second, to support homeless persons and families in obtaining safe, affordable and sustainable housing. These efforts will include a continuum of programs ranging from emergency shelters to transitional housing to permanent supportive housing services. The extent of activity will be dependent upon the level of funding available in the face of many competing needs.

DESCRIBE THE STRENGTHS AND GAPS OF THE SERVICE DELIVERY SYSTEM FOR SPECIAL NEEDS POPULATION AND PERSONS EXPERIENCING HOMELESSNESS, INCLUDING, BUT NOT LIMITED TO, THE SERVICES LISTED ABOVE.

As noted, there currently is no service delivery system as such for these populations. Local organizations have coordinated their service systems among themselves.

PROVIDE A SUMMARY OF THE STRATEGY FOR OVERCOMING GAPS IN THE INSTITUTIONAL STRUCTURE AND SERVICE DELIVERY SYSTEM TO ADDRESS PRIORITY NEEDS.

The City will seek partners in the development of a service delivery system and will seek to enhance the relationship with existing partners in City departments and social service agencies to coordinate the delivery of programs and services. The city will seek opportunities to leverage the limited available resources.

SP-45 Goals Summary

The Five-Year Consolidated Plan must summarize the City’s priorities and the specific goals it intends to initiate and/or complete within the five-year term of the Strategic Plan. These goals must be described in quantitative terms. The City of Douglas has selected funding allocations, goal outcome indicators and quantities using past and anticipated performance measures from its Annual Action Plans. These performance measures have been projected over the course of the five-year period to arrive at a total five-year funding allocation and quantity for each outcome indicator. See **Table 55**.

TABLE 55: FIVE-YEAR GOALS SUMMARY INFORMATION*

Goal Name	Description	Category	Start Year	End Year	Geographic Area	Priority Needs Addressed	Funding Allocated (Five-Year Total)	Goal Outcome Indicator	Quantity (Five-Year Total)	Unit of Measure (UoM)
Public Facility and Infrastructure Improvements	Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure.	Non-Housing Community Development	2019/2020	2023/2024	Citywide	Public Improvement/Infrastructure, Public Facilities	CDBG – \$ 671,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	21,152 persons (7,874+2,475+1,020+1,909+7,874)	Persons Assisted
Provision of Needed Services	Provide needed services for low- and moderate-income (LMI) persons and special needs populations assumed to be LMI.	Affordable Housing; Homeless; Non-Homeless Special Needs; Non-Housing Community Development	2019/2020	2023/2024	Citywide	Homeless Activities, including Homeless Prevention, Emergency Shelters, and Transitional Housing, Public Service Programs, especially for the Elderly, and for Healthcare, Economic Development, including job training, Fair Housing	CDBG - \$ 5,000	Public service activities other than Low/Moderate Income Housing Benefit, Public service activities for Low/Moderate Income Housing Benefit	10	Persons Assisted
Administration/ Planning	CDBG Administration	Program Administration	2019/2020	2023/2024	Citywide	Program administration	CDBG - \$ 169,000	N/A	N/A	N/A

*Public service projects are subject to 15% cap.

Table 55 – Goals Summary Information

ESTIMATE THE NUMBER OF EXTREMELY LOW-INCOME, LOW-INCOME, AND MODERATE-INCOME FAMILIES TO WHOM THE JURISDICTION WILL PROVIDE AFFORDABLE HOUSING AS DEFINED BY HOME 91.315(B)(2)

The City does not currently directly have any affordable housing programs. As the CDBG program develops, affordable housing will be included as a priority element, but the number of families that can be assisted will be limited because of competing needs, limited resources in general, and the cost of these programs specifically.

SP-50 Public Housing Accessibility and Involvement

NEED TO INCREASE THE NUMBER OF ACCESSIBLE UNITS (IF REQUIRED BY A SECTION 504 VOLUNTARY COMPLIANCE AGREEMENT)

The City does not have any public housing units.

ACTIVITIES TO INCREASE RESIDENT INVOLVEMENT

The City of Douglas administers the HCV program. There are 145 Mod-Rehab units which were sold to a private investor and converted to a Low-Income Housing Tax Credit Property in 2010. The Housing Department works to ensure resident involvement.

IS THE PUBLIC HOUSING AGENCY DESIGNATED AS TROUBLED UNDER 24 CFR PART 902?

Not applicable.

IF APPLICABLE, PLAN TO REMOVE THE 'TROUBLED' DESIGNATION

Not applicable.

SP-55 Barriers to Affordable Housing

BARRIERS TO AFFORDABLE HOUSING

The most important impediment to affordable housing revolves around the lack of Federal and State resources for affordable housing initiatives. The lack of programs and resources to reduce excessive rent or mortgage burdens to qualified persons is a key factor.

Despite the recent downturn in the housing market nationally and locally, housing prices, both purchase and rental, remain relatively high, especially for lower income households.

STRATEGY TO REMOVE OR AMELIORATE THE BARRIERS TO AFFORDABLE HOUSING

The primary means to address this issue in Douglas will be a housing rehabilitation program (and an emergency repair program) for both owner and renter properties in order to keep persons in their homes. The City will provide rental assistance and seek to develop affordable housing projects. The latter efforts will be limited because of the amount of funds available and the many competing needs.

SP-60 Homelessness Strategy

REACHING OUT TO HOMELESS PERSONS (ESPECIALLY UNSHELTERED PERSONS) AND ASSESSING THEIR INDIVIDUAL NEEDS

The needs of homeless persons are complex and require a wide range of specialized services. Numerous agencies are often involved in the care of a homeless person, providing distinct services such as housing, mental health counseling, employment training, and case work services.

As noted above, the City has several programs and resources, operated by not-for-profit organizations, to assist the homeless. The City itself has not been directly involved in providing assistance or services for the homeless, but recognizes this as a high priority element.

As the CDBG program develops the City will assess how it can use the limited available CDBG funds to address the needs of the homeless. At present, it appears that the use of CDBG funds to prevent homelessness (housing rehab, emergency assistance, and rental assistance) may be the most judicious approach to this complex issue.

ADDRESSING THE EMERGENCY AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

The supportive service needs of homeless persons are currently addressed by the CoC partnering agencies. The provider Catholic Community Service of Southern Arizona (CCSSA) is the only major provider of housing services to homeless individuals and families in Douglas. The CCSSA has centralized programs that serve as an emergency shelter, and transitional housing.

HELPING HOMELESS PERSONS (ESPECIALLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH) MAKE THE TRANSITION TO PERMANENT HOUSING AND INDEPENDENT LIVING, INCLUDING SHORTENING THE PERIOD OF TIME THAT INDIVIDUALS AND FAMILIES EXPERIENCE HOMELESSNESS, FACILITATING ACCESS FOR HOMELESS INDIVIDUALS AND FAMILIES TO AFFORDABLE HOUSING UNITS, AND PREVENTING INDIVIDUALS AND FAMILIES WHO WERE RECENTLY HOMELESS FROM BECOMING HOMELESS AGAIN.

The supportive service needs of homeless persons are currently addressed by the CoC partnering agencies. In order to combat homelessness and shorten the period that individuals and families are homeless it will be important for the City to partner with CCSSA to provide services for the homeless. In addition, the City will need to reach out to other service agencies that provide homeless services within the City of Douglas. Given the limited resources available to the City support may not always come in the form of funding, but continued coordination with CCSSA.

The Catholic Community Services of Southern Arizona operates a local shelter for women who are victims of domestic violence. The Housing Authority of Cochise County (HACC) operates the VASH (Veteran's Administration Supportive Housing) program throughout the County, which benefits local Veterans with housing assistance. The HACC also operates the HOPWA (Housing Assistance for Persons With AIDS) program, which also benefits Douglas residents.

HELP LOW-INCOME INDIVIDUALS AND FAMILIES AVOID BECOMING HOMELESS, ESPECIALLY EXTREMELY LOW-INCOME INDIVIDUALS AND FAMILIES WHO ARE LIKELY TO BECOME HOMELESS AFTER BEING DISCHARGED FROM A PUBLICLY FUNDED INSTITUTION OR SYSTEM OF CARE, OR WHO ARE RECEIVING ASSISTANCE FROM PUBLIC AND PRIVATE AGENCIES THAT ADDRESS HOUSING, HEALTH, SOCIAL SERVICES, EMPLOYMENT, EDUCATION OR YOUTH NEEDS

The supportive services need of homeless persons are currently addressed by the CoC partnering agencies. It is the City's priority to prevent homelessness. The Catholic Community Services of Southern Arizona operates a local shelter for women who are victims of domestic violence. The Housing Authority of Cochise County (HACC) operates the VASH (Veteran's Administration Supportive Housing) program throughout the County, which benefits local Veterans with housing assistance. The HACC also operates the HOPWA (Housing Assistance for Persons With AIDS) program, which also benefits Douglas residents.

SP-65 Lead Based Paint Hazards

ACTIONS TO ADDRESS LBP HAZARDS AND INCREASE ACCESS TO HOUSING WITHOUT LBP HAZARDS

Using the HUD formula for assessing the extent of lead-based paint in homes, the City has approximately 3,198 housing units with the presence of lead-based paint in them. However, the data provided in the HUD-provided data indicates that there are only 315 pre-1980 housing units with children in them.

Federal regulations effective September 2000 implemented lead-based paint requirements for all housing activities undertaken by recipients of HUD funds. These regulations require multiple approaches to evaluate, control and/or abate lead-based paint. Since inception of the CDBG program, all homes older than 1978 scheduled for rehabilitation activities receive lead-based paint testing to determine the extent of lead hazards.

The City will take several steps to meet lead-based paint requirements including:

- Distributing the “Protect Your Family from Lead in Your Home” pamphlet to homeowners receiving housing rehabilitation services or homebuyer assistance
- Identification of potential lead hazards for all houses which were built before 1978 which receive HUD-funded rehabilitation/homebuyer assistance
- Treatment of lead hazards on HUD funded rehabilitation projects as mandated by HUD and Environmental Protection Agency (EPA) regulations and requirements
- Ensuring that all contractors follow the most recent regulatory changes

HOW ARE THE ACTIONS LISTED ABOVE RELATED TO THE EXTENT OF LEAD POISONING AND HAZARDS?

Housing built before 1980 is presumed to have a higher risk of lead-based paint. In the City of Douglas, 75 percent of owner-occupied housing units were built prior to 1980. For renter-occupied units, 56 percent were built prior to 1980. Based on the overall low/mod percentage for the city of 63.16%, it is estimated that approximately 63% of these housing units are occupied by low- and moderate-income families. Generally, these statistics point toward the need for the City of Douglas to facilitate both owner-unit and rental-unit rehabilitations within its jurisdiction.

HOW ARE THE ACTIONS LISTED ABOVE INTEGRATED INTO HOUSING POLICIES AND PROCEDURES?

Federal regulations effective September 2000 implemented lead-based paint requirements for all housing activities undertaken by recipients of HUD funds. These regulations require multiple approaches to evaluate, control and/or abate lead-based paint. Since inception of the CDBG program, all homes older than 1978 scheduled for rehabilitation activities receive lead-based paint testing to determine the extent of lead hazards.

The City of Douglas requires inspection of units undergoing rehabilitation through housing programs. This inspection includes documentation of the year built, names and ages of the children living in the unit (if under 7 years), and whether the children have symptoms of elevated blood lead levels (EBL). If any child has symptoms, then all chewable surfaces up to five feet from the ground will be tested and abated (i.e., covered or removed).

For every rehabilitation project, the resident is given an educational pamphlet on the dangers of lead-based paint, including the age of homes affected, age group most susceptible, symptoms of EBL and whom to contact if symptoms are evident. Children residing in rehabilitation projects found to have lead-based paint hazards are referred for screening and treatment.

Each substandard housing unit to be rehabilitated is inspected and tested by a licensed inspector to identify lead-based paint hazards. A report with the rehabilitation approach and strategy to eliminate lead hazards is issued to the Housing Department and the homeowner by the inspector(s).

SP-70 Anti-Poverty Strategy

JURISDICTION GOALS, PROGRAMS AND POLICIES FOR REDUCING THE NUMBER OF POVERTY-LEVEL FAMILIES

The City of Douglas recognizes that the core of many social and housing problems relates to poverty. The objective of poverty reduction requires programming for broad areas including increased accessibility of resources, job training and placement, public services, education, and basic skills development. It is only through comprehensive, coordinated strategies that nurture skills and provide opportunities to gain and retain employment and thus improve the quality of life that people can improve their situation.

HOW ARE THE JURISDICTION POVERTY REDUCING GOALS, PROGRAMS, AND POLICIES COORDINATED WITH THIS AFFORDABLE HOUSING PLAN?

Because the nature of poverty is complex and multi-faceted, the City will attempt to allocate CDBG funds for services to very low-income households. Research shows that some of these services may have a direct impact on lowering the poverty rate for family households. Therefore, as a primary goal, the City will attempt to fund programs that provide job training, education and other employment related services, and childcare services for working families. CDBG can provide funding for meeting these critical basic needs, but these efforts will be constrained by the amount of funds available and competing priority needs.

SP-80 Monitoring

DESCRIBE THE STANDARDS AND PROCEDURES THAT THE JURISDICTION WILL USE TO MONITOR ACTIVITIES CARRIED OUT IN FURTHERANCE OF THE PLAN AND WILL USE TO ENSURE LONG-TERM COMPLIANCE WITH REQUIREMENTS OF THE PROGRAMS INVOLVED, INCLUDING MINORITY BUSINESS OUTREACH AND THE COMPREHENSIVE PLANNING REQUIREMENTS

As a new entitlement community, the City of Douglas is developing its monitoring standards and procedures. The City has access to models from other jurisdictions and has begun to develop its own set of monitoring procedures. The following description outlines the policies, standards and procedures that the City will employ to ensure compliance with program requirements.

The Housing Department views its monitoring responsibilities as an ongoing process, involving continuing communication, evaluation, and follow-up. The process involves frequent telephone contacts, written communications, the analyses of reports, audits, and periodic meetings with the sub-grantee. The Department's staff will stay informed concerning compliance with program requirements and the extent to which technical assistance is needed. To execute its monitoring program the Housing Department will develop and implement monitoring procedures to ensure that recipients and sub-recipients of HUD funds are in compliance with Federal regulations and program guidelines.

The overriding goal of monitoring is to identify deficiencies and promote corrections in order to improve and reinforce performance. Deficiencies are corrected through discussion, negotiation, or technical assistance. The three stages utilized for addressing problem areas are early identification of problems, intervention for more serious or persistent problems, and sanctions.

Non-profit organizations that receive CDBG funds will be required to submit monthly financial and performance reports prior to reimbursement of expenditures. These reports will provide sufficient information to document compliance with timely expenditures and performance objectives. Performance objectives and outcomes will be required of all nonprofits receiving funding and will be incorporated in the contract agreement with the City. Monthly reports will allow for monthly "desk monitoring" throughout the program year. The Housing Department will review these reports on a monthly basis.

If developed in Douglas, Community Housing Development Organizations (CHDOs) will submit monthly performance and matching reports to the department to ensure ongoing compliance and goal accomplishments. These organizations will be subject to annual CHDO certification and annual monitoring when new projects begin, or when deemed necessary through a risk assessment. City staff will provide technical assistance to social service and housing organizations that receive Federal funds either by phone, email, or on-site visits whenever a change in program staff or other operational concerns develop.

AP-15 Expected Resources

INTRODUCTION

The Five-Year Consolidated Plan identifies the federal, state, local and private resources expected to be available to City of Douglas to address priority needs and specific objectives identified in the Strategic Plan. These resources are summarized in SP-35.

The City of Douglas anticipates a total allocation of \$173,759 in CDBG funding for the 2019/2020 program year. The City does not expect prior year resources. CDBG funds will be used for public investment in facility and infrastructure improvements that benefit low- and moderate-income neighborhoods.

Expected resources are summarized in **Table 56**.

The Annual Action Plan must summarize the City's priorities and the specific goals it intends to initiate and/or complete within the first year of the Strategic Plan. These goals must be described in quantitative terms. The City of Douglas has selected goal outcome indicators and quantities based on the anticipated performance measure of the 2019/2020 Annual Action Plan. See **Table 57**.

TABLE 56: 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	Admin and Planning; Public Improvements and Facility Improvements	\$ 173,759	\$ 0	\$ 0	\$ 173,759	\$676,000	The City will look to leverage funds, if available, from other sources against CDBG dollars.

Table 56 – Anticipated Resources

EXPLAIN HOW FEDERAL FUNDS WILL LEVERAGE THOSE ADDITIONAL RESOURCES (PRIVATE, STATE AND LOCAL FUNDS), INCLUDING A DESCRIPTION OF HOW MATCHING REQUIREMENTS WILL BE SATISFIED

The City will look to leverage funds, if available, from other sources, such as City departments, public or social service providers, or other sources against CDBG dollars. The City will look to leverage funds, if available, from Community Housing Development Organizations (CHDOs), Public Housing Authorities (PHAs), or other agencies and programs against CDBG dollars.

IF APPROPRIATE, DESCRIBE PUBLICLY OWNED LAND OR PROPERTY LOCATED WITHIN THE JURISDICTION THAT MAY BE USED TO ADDRESS THE NEEDS IDENTIFIED IN THE PLAN

The City of Douglas does not have any publicly owned land or property within the jurisdiction that may be used to address the needs identified in this plan.

Discussion

City of Douglas's anticipated funding allocation from CDBG will address the City's goal of public facility and infrastructure improvements. Moreover, the City of Douglas will seek to cultivate funding partners who can contribute to the City's investment of CDBG funds.

AP-20 Annual Goals and Objectives

TABLE 57(A): ONE-YEAR GOALS SUMMARY INFORMATION

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Priority Needs Addressed	Funding Allocated (1-Year)	Goal Outcome Indicator	Quantity	Unit of Measure (UoM)
1	Public Facility and Infrastructure Improvements	2019	2020	Non-Housing Community Development	Citywide	Public Improvement/Infrastructure, Public Facilities	\$ 139,008	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	7,874	Persons Assisted
2	Provision of Needed Services	2019	2020	Homeless; Non-Homeless Special Needs; Non-Housing Community Development	Citywide	Homeless Activities, including Homeless Prevention, Emergency Shelters, and Transitional Housing, Public Service Programs, especially for the Elderly, and for Healthcare, Economic Development, including job training, Fair Housing	\$ 0	Public service activities other than Low/Moderate Income Housing Benefit,	0	Persons Assisted
3	Administration/ Planning	2019	2020	Program Administration	Citywide	Program Administration	\$ 34,751	N/A	N/A	N/A
							\$ 173,759			

Table 57(A) – One Year Goals Summary

TABLE 57(B) – GOAL DESCRIPTIONS

1	Goal Name	Public Facility and Infrastructure Improvements
	Goal Description	Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure. CDBG - \$139,008
2	Goal Name	Provision of Needed Services
	Goal Description	Provide needed services for low- and moderate-income (LMI) persons and special needs populations assumed to be LMI. CDBG - \$0
3	Goal Name	General Administration/Planning
	Goal Description	Administration and planning of the CDBG program. Program administration addresses all outcomes, objectives and priority needs. CDBG - \$34,751

Table 57(B) – Goal Descriptions

AP-35 Projects – 91.220(d)

INTRODUCTION

City of Douglas’s planned actions for the 2019/2020 Annual Action Plan are intended to support community development for the City’s low- and moderate-income populations.

The City will continue to operate its CDBG program through the Housing Department which will continue to provide support for Fair Housing and social services information, public facilities, housing rehabilitation, and food assistance. These actions will further the goals of administration and planning, provision of needed services, and public facility and infrastructure improvements.

As in the past, the City will continue to coordinate with public or social service providers to promote access to public services for special needs populations generally assumed to be low- and moderate-income. During the 2019/2020 program year, the City will fund improvements to the Aquatic Center Facility.

Although the City is not funding public services this program year, the City will continue to explore opportunities during the five-year cycle to leverage CDBG funds with public service providers that provide needed services.

Planned community development activities include facility and infrastructure improvements to improve the quality of life for people living in low- and moderate-income neighborhoods.

City of Douglas’s planned actions for the 2019/2020 Annual Action Plan are summarized in **Table 59**.

TABLE 58: PROJECTS

#	Project Name
1	Aquatic Center Facility Improvements
2	Administration/Planning

Table 58 - Project Information

DESCRIBE THE REASONS FOR ALLOCATION PRIORITIES AND ANY OBSTACLES TO ADDRESSING UNDERSERVED NEEDS

The allocation priorities are focused on the three (3) goals of the Strategic Plan: Public Facility/Infrastructure Improvements, Provision of Needed Services, and Administration/Planning. It is important to note that total funding for public services is capped at 15% of the total CDBG allocation. Total funding for activities related to administration is capped at 20% for CDBG.

<u>Strategic Plan Goal</u>	<u>Amount (% of Total Award)*</u>	
Administration/Planning	\$34,751	20%
Public Facility/Infrastructure Improvements	\$139,008	80%

**Excludes program income and prior year resources. Percentages may not equal 100% due to rounding.*

The City’s primary obstacle to meeting underserved needs is a lack of funding. The City of Douglas receives a relatively small annual CDBG allocation. This lack of resources has hindered the City’s ability to meet the needs of low-income residents. Another obstacle to meeting underserved need is the generally a high demand for public services that is placing an additional burden on public service agencies within the City. The City is limited to a cap of 15% for public services funding and has not allocated any of the 2019 CDBG allocation to public service activities.

AP-38 Project Summary

TABLE 59: PROJECT SUMMARY INFORMATION

1	Project Name	Aquatic Center Improvements
	Geographic Area	Citywide
	Goals Supported	Public Facility/Infrastructure Improvements
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$139,008
	Target Date	09/30/2020
	Benefit	7,874 (Total Number of LMI Persons in City)
	Location	1551 E 15 th Street, Douglas, AZ 85607. Census Tract 800 Block Group 2
	Description	Improvements to Aquatic Center Facility with an LMI area, including new pump system, new dehumidifying system, and new LED lights on basketball courts. This project provides a city-wide benefit. The City's overall low- and moderate-income percentage is 63.16%. Census Tract 800 Block Group 2 has a 70.1% LMI Population. CDBG - \$139,007
Planned Activities	Aquatic Center Facility improvements	
2	Project Name	Program Administration/Planning
	Geographic Area	Citywide
	Goals Supported	Administration/Planning
	Needs Addressed	Program Administration [Indirect Need]
	Funding	CDBG: \$34,751
	Target Date	06/30/2020
	Benefit	Other: Administration of overall CDBG program for one (1) year
	Location	Not applicable
	Description	Annual action planning, project development, coordination and compliance oversight, and administration activities. Program administration addresses all outcomes (2019/2020). CDBG - \$34,751
Planned Activities	Program Administration	

Table 59: Project Summary Information

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

For the 2019/2020 Annual Action Plan, City of Douglas will provide indirect assistance to low- and moderate-income areas of the City in addition to improving the City as a whole. Assistance will be made available citywide to persons meeting the CDBG eligibility requirements for low- and moderate-income benefit.

Over the next year, activities will not be targeted to any Target Area; however, the City estimates that 100% of its CDBG funds will be used to benefit low- and moderate-income persons citywide. Again, assistance will also be made available citywide to eligible persons living within the City of Douglas limits. (See **Table 60**)

TABLE 60: GEOGRAPHIC DISTRIBUTION

Target Area	Percentage of Funds
Low- and Moderate-Income Areas	100%

Table 60 - Geographic Distribution

RATIONALE FOR THE PRIORITIES FOR ALLOCATING INVESTMENTS GEOGRAPHICALLY

City of Douglas's rationale for allocating investments semi-geographically is dependent upon the location of low- and moderate-income populations, which are most concentrated in the areas with the highest percentage of low- and moderate-income Census Block Groups.

All other activities will benefit any person meeting the CDBG eligibility requirements for low- and moderate-income benefit, as well as families and individuals citywide.

DISCUSSION

City of Douglas has identified two (2) projects to implement the three goals of the Strategic Plan during the first year of the 2019/2020-2023/2024 Consolidated Plan. These projects benefit low- and moderate-income persons citywide.

AP-55 Affordable Housing – 91.220(g)

INTRODUCTION

The Annual Action Plan must specify goals for the number of homeless, non-homeless, and special needs households to be supported within the program year. These numbers are shown in **Table 61** and are inclusive of the community development-related activities shown in **Table 57**, in addition to the activities identified in **Table 59**.

Table 62 indicates the number of households to be supported through specific activities, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units. For the purposes of this section, the term, “affordable housing” is defined in the HOME regulations at 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. [This section replaces the former HUD Table 3B.]

TABLE 61: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 61 - One Year Goals for Affordable Housing by Support Requirement

TABLE 62: ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

Table 62 - One Year Goals for Affordable Housing by Support Type

DISCUSSION

The City of Douglas does not plan to provide affordable housing support in the form of funding through the CDBG program during the first year of the 2019/2020-2023/2024 Consolidated Plan. The primary focus of the 2019/2020 Annual Action Plan is to provide public facilities/infrastructure improvements.

Affordable housing support during the remaining years (i.e., next four years) of the 2019/2020-2023/2024 Consolidated Plan may include housing rehabilitation in support of affordable housing.

AP-60 Public Housing – 91.220(h)

INTRODUCTION

This section of the Annual Action Plan describes what actions the City of Douglas will take in the 2019/2020 program year to carry out the public housing portion of the Strategic Plan. Below, the City has identified the way the 2019/2020 Annual Action Plan will address the needs of public housing during the program year.

The Douglas Housing Authority works collaboratively with the City to assist low- and moderate-income households. The Authority, working through the City Housing Department has undertaken a number of initiatives to improve public housing, and continues to maintain a close working relationship with other City agencies and social service providers.

ACTIONS PLANNED DURING THE NEXT YEAR TO ADDRESS THE NEEDS TO PUBLIC HOUSING

The City agrees with, is supportive of, and coordinates programs and activities in line with the goals and objectives of the Housing Authority; however, the City does not have any direct actions planned during the next year to address the needs of public housing.

The City of Douglas Public Housing Authority will continue to administer the HCV program which provides extremely low and very-low income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Housing choice vouchers are administered locally by the City of Douglas Public Housing Authority (PHA).

Additionally, the PHA will assist our Section 8 Clients through the FSS program to achieve the best life possible for themselves and their families. The FSS program empowers individuals to look for economic stability through education, case management and referral to available resources in the community that help them attain their goals. Services provided include adult education (GED and ESL classes), case management, childcare, ESCROW savings account, home ownership counseling, improvement of work skills, Job search assistance, transportation, and workshops.

ACTIONS TO ENCOURAGE PUBLIC HOUSING RESIDENTS TO BECOME MORE INVOLVED IN MANAGEMENT AND PARTICIPATE IN HOMEOWNERSHIP

The City supports the Authority's efforts to involve residents in management and homeownership but does not have the resources necessary to assist in these programs.

The FSS program empowers individuals to look for economic stability through education, case management and referral to available resources in the community that help them attain their goals. Services provided include adult education (GED and ESL classes), case management, childcare, ESCROW savings account, home ownership counseling, improvement of work skills, Job search assistance, transportation, and workshops.

IF THE PHA IS DESIGNATED AS TROUBLED, DESCRIBE THE MANNER IN WHICH FINANCIAL ASSISTANCE WILL BE PROVIDED OR OTHER ASSISTANCE

Not applicable. The Douglas Housing Authority is not a troubled agency.

DISCUSSION

In conjunction with the Douglas Housing Authority, the Housing Department is responsible for carrying out activities related to public housing. During this year of the plan, there are not any directly related public housing activities planned, as the City does not have adequate resources to satisfactorily administer these programs.

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

INTRODUCTION

This section of the Annual Action Plan describes City of Douglas's one-year goal and the specific action steps it will undertake in the program year to carry out the homeless strategy identified in the Strategic Plan. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations.

DESCRIBE THE JURISDICTIONS ONE-YEAR GOALS AND ACTIONS FOR REDUCING AND ENDING HOMELESSNESS INCLUDING

The City of Douglas Public Housing Authority works in collaboration with Cenpatico, administering housing assistance vouchers through its "Bridge Subsidy Program", which provides housing assistance

vouchers to mentally ill residents. The bridge subsidy is meant to fill the gap for assistance while the program participants process through the waiting list for the Section 8 Housing Choice Voucher program.

The City of Douglas will consider pursuing activities to address the housing and supportive service needs of persons who are homeless with the goal of reduced homelessness. However, the City does not have the procedures, policies, or mechanisms in place to assist organization in providing these types of services. Currently, homeless-related services fall on the responsibility of external organizations and agencies.

REACHING OUT TO HOMELESS PERSONS (ESPECIALLY UNSHELTERED PERSONS) AND ASSESSING THEIR INDIVIDUAL NEEDS

The City is aware of and employs the services and programs of the state, the county, and a number of not-for-profit service providers to assist the homeless and to assess their needs. Currently, homeless-related services fall on the responsibility of external organizations and agencies.

ADDRESSING THE EMERGENCY SHELTER AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

The City is aware of and employs the services and programs of the state, the county, and a number of not-for-profit service providers to assist the homeless and to assess their needs. Currently, homeless-related services fall on the responsibility of external organizations and agencies.

HELPING HOMELESS PERSONS (ESPECIALLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH) MAKE THE TRANSITION TO PERMANENT HOUSING AND INDEPENDENT LIVING, INCLUDING SHORTENING THE PERIOD OF TIME THAT INDIVIDUALS AND FAMILIES EXPERIENCE HOMELESSNESS, FACILITATING ACCESS FOR HOMELESS INDIVIDUALS AND FAMILIES TO AFFORDABLE HOUSING UNITS, AND PREVENTING INDIVIDUALS AND FAMILIES WHO WERE RECENTLY HOMELESS FROM BECOMING HOMELESS AGAIN

The City is aware of and employs the services and programs of the state, the county, and a number of not-for-profit service providers to assist the homeless and to assess their needs. Currently, homeless-related services fall on the responsibility of external organizations and agencies.

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.

The City is aware of and employs the services and programs of the state, the county, and a number of not-for-profit service providers to assist the homeless and to assess their needs. Currently, homeless-related services fall on the responsibility of external organizations and agencies.

DISCUSSION

Please see preceding responses.

AP-75 Barriers to Affordable Housing – 91.220(j)

INTRODUCTION:

This section of the Annual Action Plan summarizes actions the City of Douglas will undertake during the program year to reduce barriers to affordable housing and influence whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

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

In the past, the primary means to address this issue in Douglas was through a housing rehabilitation program (and an emergency repair program) for both owner and renter properties in order to keep persons in their homes. The City has explored providing rental assistance and/or seek to develop affordable housing projects. Due to lack of resources and competing needs these efforts have been limited.

The City has sought additional funding from the Arizona Department of Housing (ADOH) State Housing Funds for Owner Occupied Housing Rehabilitation.

For this fiscal year, the City of Douglas does not have any actions planned to remove or ameliorate the negative effects of public policies which serve as a barrier to affordable housing.

DISCUSSION:

The City hopes to address these issues in future years; however, a lack of funding may inhibit progress needed to make enough of an impact.

AP-85 Other Actions – 91.220(k)

INTRODUCTION:

This section of the Annual Action Plan describes the City of Douglas’s planned actions to carry out the following strategies outlined in the Strategic Plan:

- Foster and maintain affordable housing;
- Evaluate and reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination between public and private housing and social service agencies.

In addition, the City has identified obstacles to meeting underserved needs and proposed actions to overcome those obstacles.

ACTIONS PLANNED TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS

The greatest challenge to meeting underserved needs in the coming year will be meeting the increased need for program activities with a limited amount of funding. To overcome this significant challenge, the City will work more efficiently, seek a greater level of collaboration with other agencies and organizations, and aggressively seek opportunities to leverage funds.

ACTIONS PLANNED TO FOSTER AND MAINTAIN AFFORDABLE HOUSING

As noted above, the City will provide rental assistance and seek to develop affordable housing projects during future program years. The City will continue to operate its Section 8 Housing Choice Voucher program. In addition to these activities, the City of Douglas will seek out other funding sources, such as HOME and State Housing Fund, for housing rehabilitation programs. There continues to be a great need for these programs in the community, and funding sources are scarce.

ACTIONS PLANNED TO REDUCE LEAD-BASED PAINT HAZARDS

City of Douglas will continue to evaluate lead-based paint hazards, particularly for low- and moderate-income residents, and will incorporate all HUD requirements concerning lead-based paint abatement into its housing rehabilitation programs. The City will ensure that program participants are informed about lead-based paint hazards and will see that all abatement work is undertaken by qualified contractors who have completed US HUD and EPA lead training courses.

ACTIONS PLANNED TO REDUCE THE NUMBER OF POVERTY-LEVEL FAMILIES

According to the 2013-2017 American Community Survey (ACS) estimates, nearly 32% percent of people living in the City of Douglas are at poverty level or below. To combat this trend, the City of will attempt to allocate CDBG funds for services to very low-income households. CDBG can provide funding for meeting these critical basic needs, but these efforts will be constrained by the amount of funds available and competing priority needs.

ACTIONS PLANNED TO DEVELOP INSTITUTIONAL STRUCTURE

The City will seek partners in the development of a service delivery system and will seek to enhance the relationship with existing partners in City departments and social service agencies to coordinate the delivery of programs and services. The city will seek opportunities to leverage the limited available resources.

ACTIONS PLANNED TO ENHANCE COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES

The City maintains a close relationship with state, regional, and county organizations that assist low- and moderate-income persons as well as the homeless.

The City will work closely with local non-profit organizations to actively encourage housing programs for low- and moderate-income persons. Also, the Housing Department will develop and maintain a positive relationship with the builders, developers, and financial institutions in the region. This collaborative approach will assist in the creation and delivery of effective service delivery programs and affordable housing projects.

DISCUSSION:

The City's actions to address obstacles to meeting underserved needs will be limited this fiscal year due to a lack of funding. The City will continue to seek out other funding avenues when possible to spread the resources. In the future, the City hopes to include programs related to housing assistance and basic needs assistance, community development activities such as City infrastructure and park improvements, and public services for low- and moderate-income persons. At this time, the City does not have the resources to complete all of these activities, but will consider incorporating them in future plans.

The Housing Department will ensure that lead-based paint hazards will continue to be evaluated as-needed.

Institutional delivery structure will continue to be developed through continued selection of appropriate public and private partners, and coordination with neighborhood associations, and grass-roots initiatives. The City will continue to foster inter-agency coordination within the community.

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

INTRODUCTION:

This section addresses the program-specific requirements for the Annual Action Plan.

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG) REFERENCE 24 CFR 91.220(L)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies any available program income that may be included in projects to be carried out, any urgent need activities, and the estimated percentage of CDBG funds that will be

used for activities that benefit persons of low- and moderate-income during the 2019/2020 program year.

TABLE 63: AVAILABLE PROGRAM INCOME

Available Program Income	Amount
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
Total Program Income	\$0

Table 63 - Available Program Income

TABLE 64: OTHER CDBG REQUIREMENTS

Other CDBG Requirements	Amount
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 (for year 2019/2020).	100%
<i>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 low- and moderate-income. Specify the years covered that include this Annual Action Plan.</i>	

Table 64 - Other CDBG Requirements

DISCUSSION:

City of Douglas anticipates no program income to be available during the year. In the event that program income is received funds will be distributed among active eligible CDBG activities. The City has not identified funds for urgent need activities at this time; however, the percentage of overall benefit to low- and moderate-income persons is expected to be 100%. City of Douglas has calculated the percentage of overall benefit based on the first program year (2019/2020).

Appendix

1. Maps
2. Certifications and SF 424
3. Public Participation Summaries
4. Public Notices
5. Citizen Participation Plan

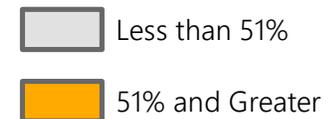
1. Maps

CITY OF DOUGLAS, ARIZONA

2019-2023 Consolidated Plan

Low and Moderate Income Areas by Block Group

Percent of Persons below the Low/Mod
Income Threshold, by Block Group



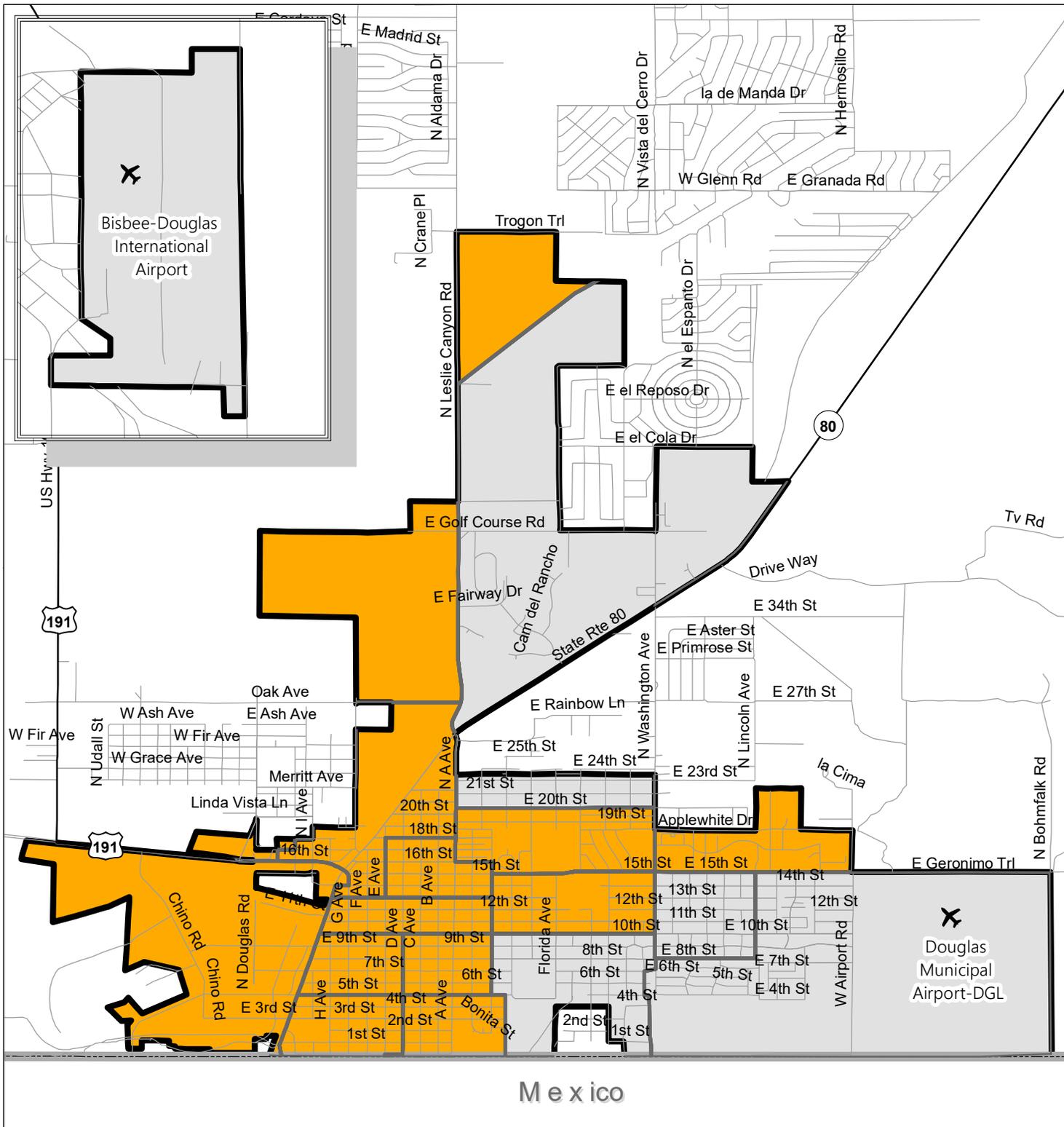
Base Data



June 2019

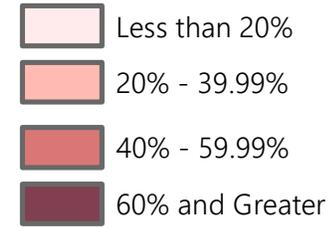


Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American
Community Survey 5-Year Estimates; HIFLD Open Data
ACS 5-Year 2011-2015 Low-and Moderate-Income Summary Data

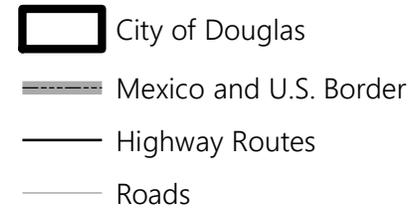


Low Income Areas by Block Group

Percent of Persons below the Low Income Threshold, by Block Group



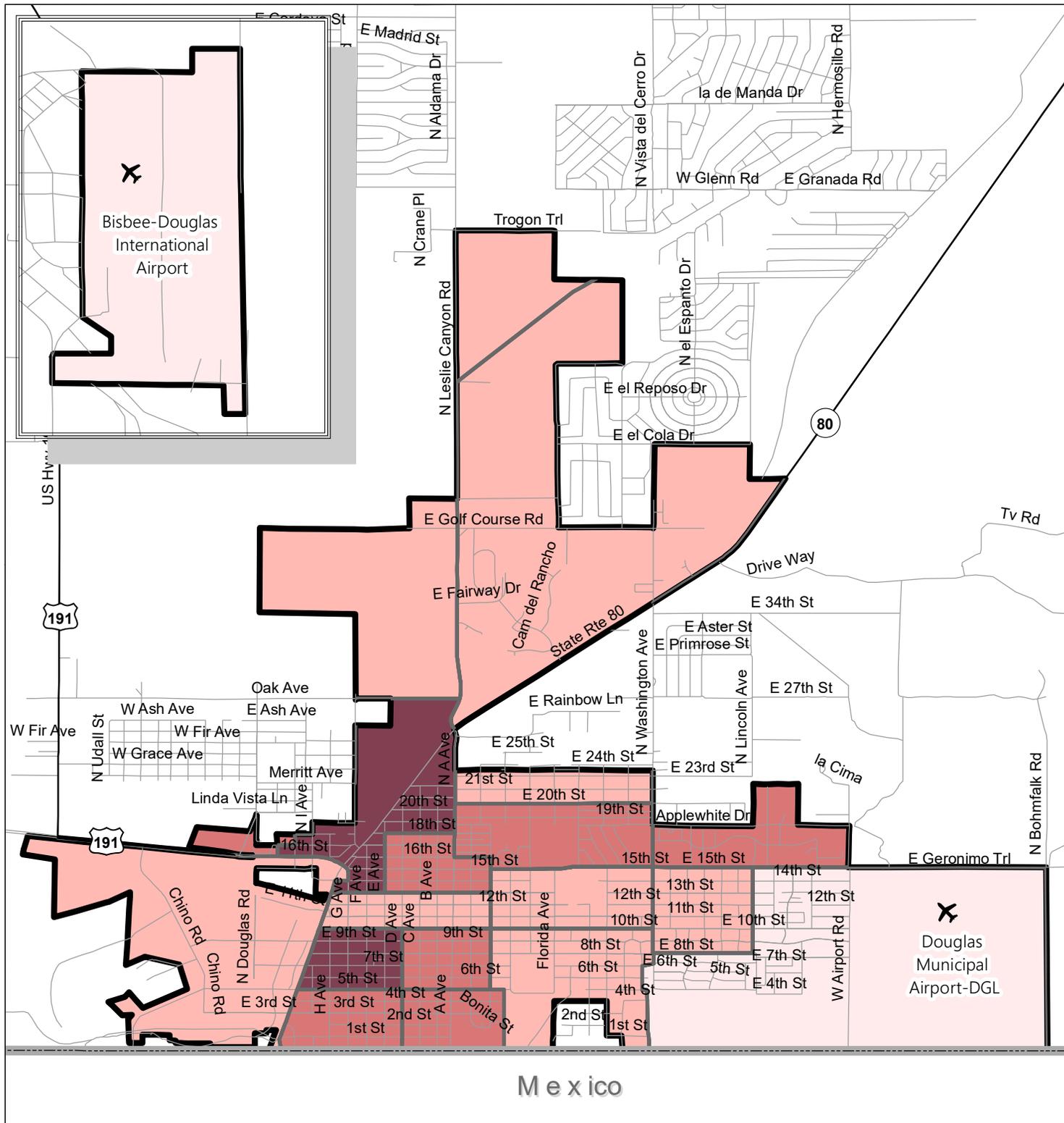
Base Data



June 2019



Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American Community Survey 5-Year Estimates; HIFLD Open Data ACS 5-Year 2011-2015 Low-and Moderate-Income Summary Data



African American Population

Percent of African American Population, by Block Group



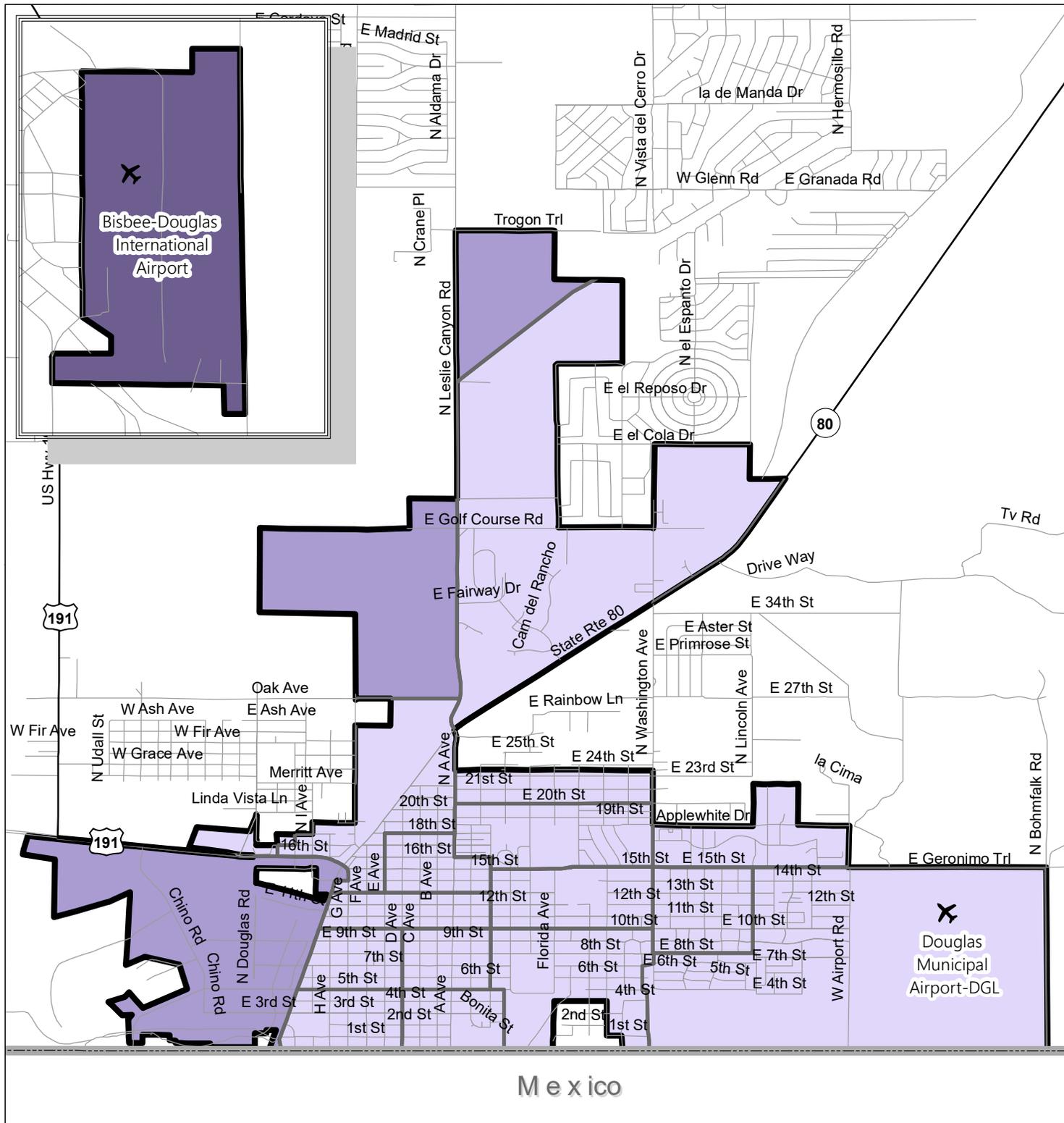
Base Data



June 2019



Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American Community Survey 5-Year Estimates; HIFLD Open Data 2013-2017 American Community Survey 5-Year Estimates



Mexico

Hispanic Population

Percent of Hispanic Population,
by Block Group



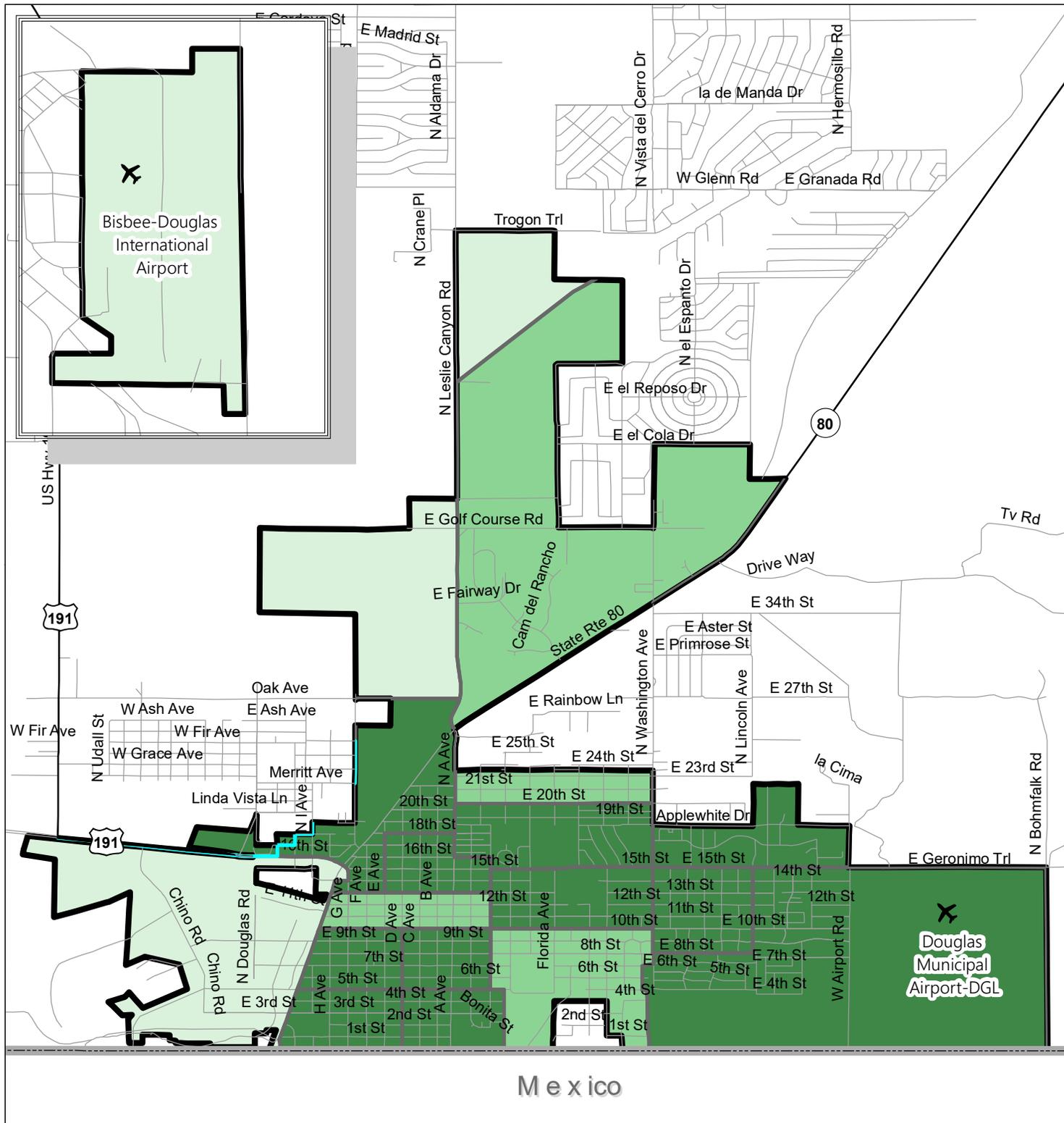
Base Data



June 2019



Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American Community Survey 5-Year Estimates; HIFLD Open Data 2013-2017 American Community Survey 5-Year Estimates



Mexico

CITY OF DOUGLAS, ARIZONA

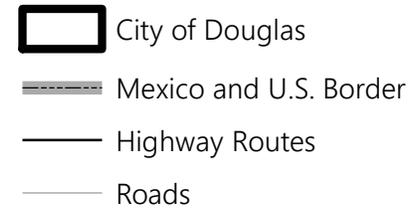
2019-2023 Consolidated Plan

Two or More Races Population

Percent of Population Reporting as
Two or More Races, by Block Group



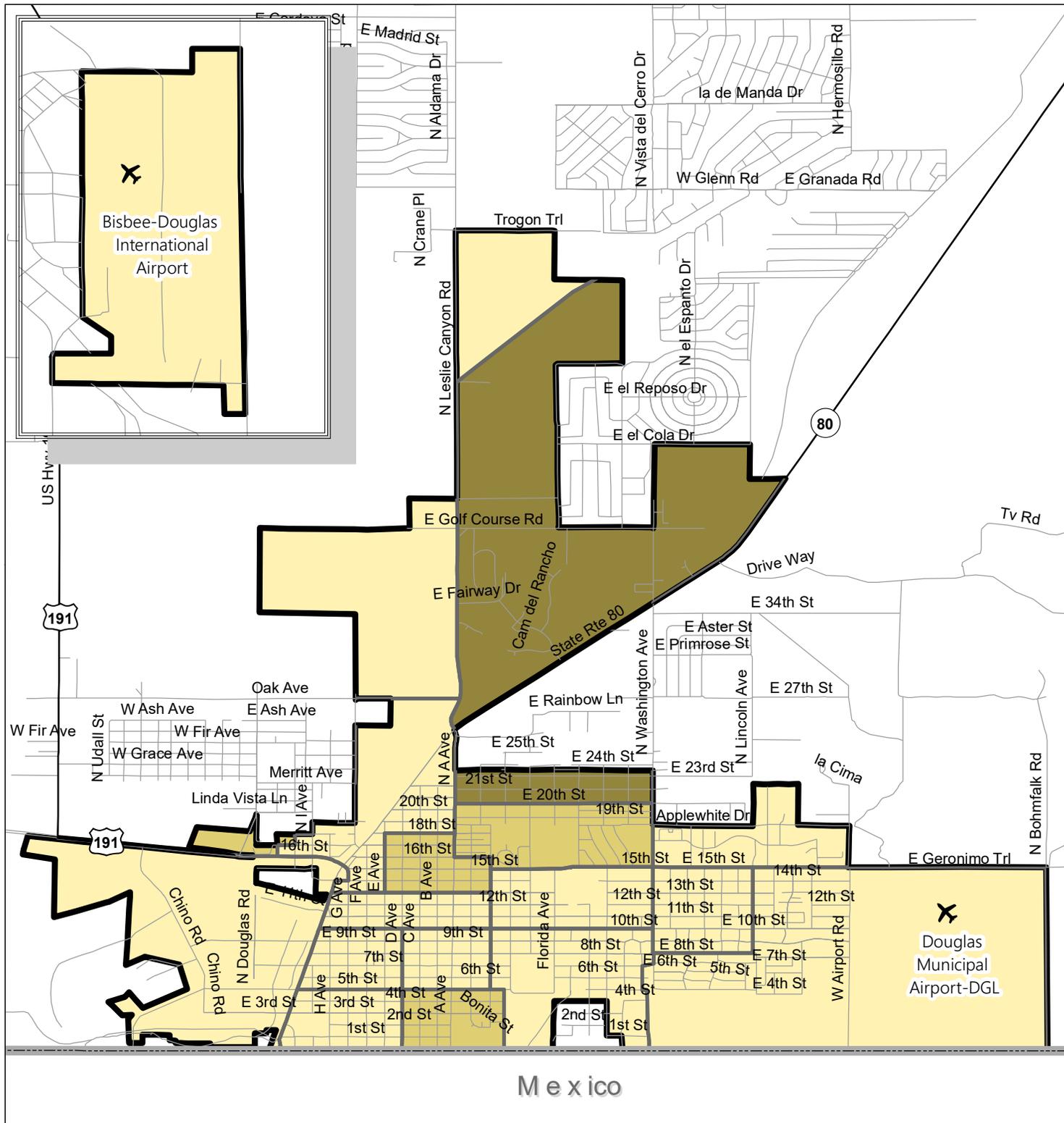
Base Data



June 2019



Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American Community Survey 5-Year Estimates; HIFLD Open Data 2013-2017 American Community Survey 5-Year Estimates



Other Race Population

Percent of Population Reporting
Race as 'Other', by Block Group



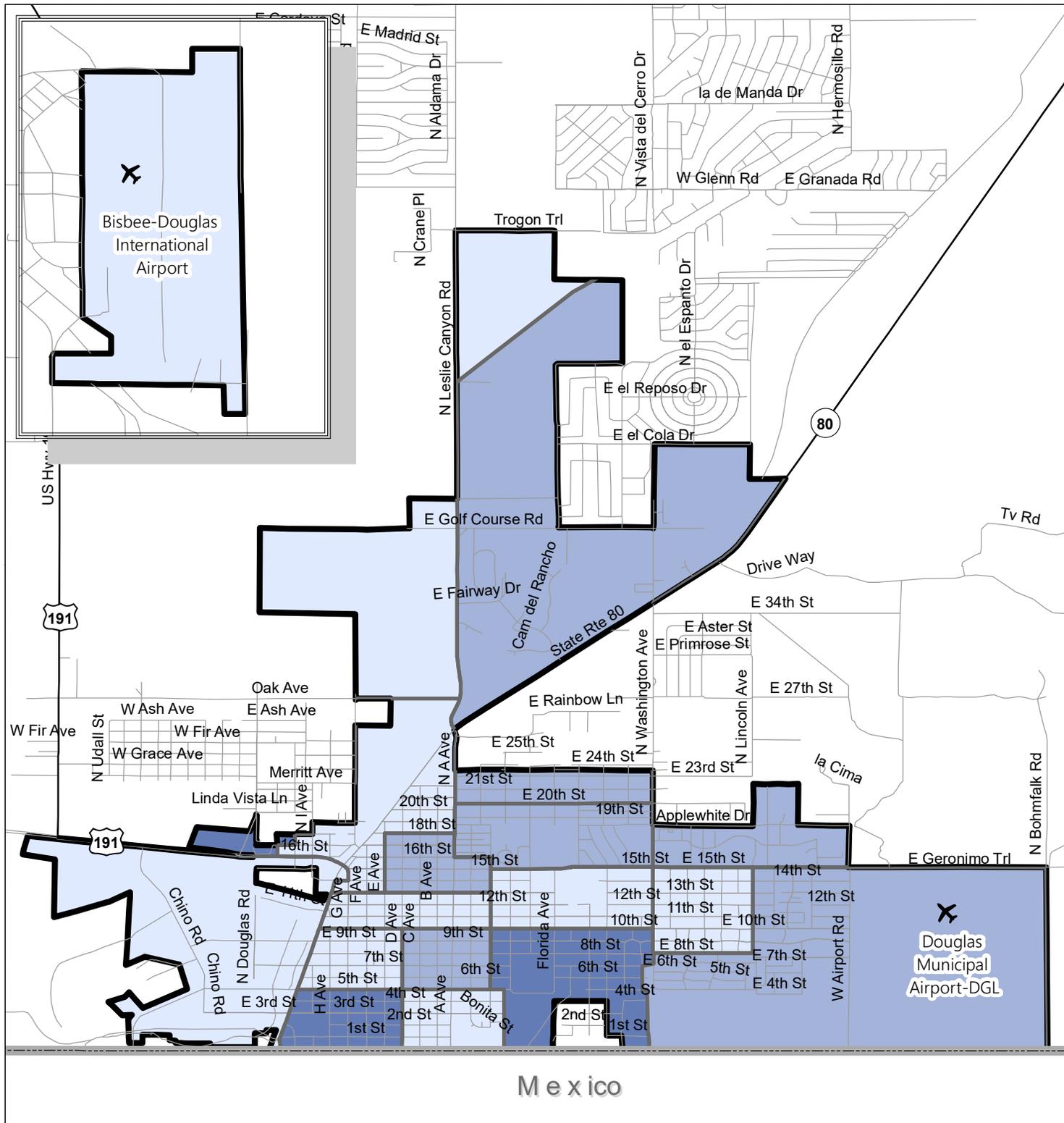
Base Data



June 2019



Sources: U.S. TIGER/Line Shapefiles; 2013-2017 American Community Survey 5-Year Estimates; HIFLD Open Data 2013-2017 American Community Survey 5-Year Estimates



2. Certifications and SF 424

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
--	--	--

* 3. Date Received: <input type="text" value="08/15/2019"/>	4. Applicant Identifier: <input type="text"/>
--	--

5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
--	---

State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: <input type="text" value="City of Douglas, AZ"/>	
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="86-6000241"/>	* c. Organizational DUNS: <input type="text" value="0790115160000"/>

d. Address:

* Street1: <input type="text" value="425 E. 10th Street"/>
Street2: <input type="text"/>
* City: <input type="text" value="Douglas"/>
County/Parish: <input type="text" value="Cochise"/>
* State: <input type="text" value="AZ: Arizona"/>
Province: <input type="text"/>
* Country: <input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code: <input type="text" value="85607-0000"/>

e. Organizational Unit:

Department Name: <input type="text" value="Housing"/>	Division Name: <input type="text"/>
---	-------------------------------------

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Xenia"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Gonzalez"/>	
Suffix: <input type="text"/>	

Title: <input type="text" value="Housing Manager"/>

Organizational Affiliation: <input type="text"/>
--

* Telephone Number: <input type="text" value="520-417-7385"/>	Fax Number: <input type="text"/>
---	----------------------------------

* Email: <input type="text" value="xenia.gonzalez@douglasaz.gov"/>
--

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

Community Development Block Grants/Entitlement Grants

*** 12. Funding Opportunity Number:**

N/A

* Title:

N/A

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

LowModIncome.pdf

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

CDBG Entitlement 2019-2020 Action Plan/Activity Submission (for the City of Douglas, Cochise County, AZ)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="173,759.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="173,759.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

**** I AGREE**

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

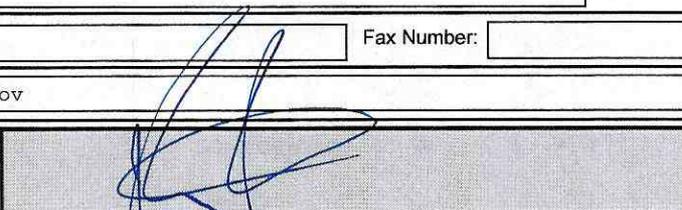
Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE MAJOR
APPLICANT ORGANIZATION CITY OF DOUGLAS	DATE SUBMITTED 8/14/19

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

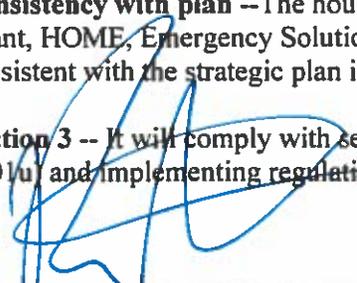
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official

8/14/19

Date

Mayor

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019-2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

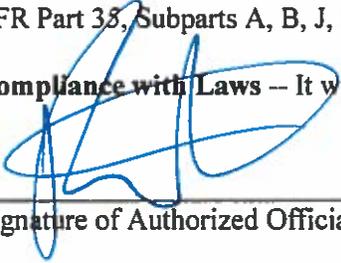
Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 38, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

8/14/19

Date

MAYOR

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

3. Public Participation Summaries

CDBG PUBLIC HEARING

June 26, 2019

4:00 P.M. – CITY HALL COUNCIL CHAMBERS

A public hearing was held on June 26, 2019 at 4:00 p.m. in the City Hall Council Chambers, in order to present the 5-Year Consolidated Plan and FY 2019 Annual Action Plan for CDBG Entitlement funds.

City staff members present were: Interim City Manager, Jerene Watson; Finance Director, Luis Pedroza; Economic Development Director, David Carranza, IT Manager, Joel Camacho; Library Manager, Margaret White; and Housing Manager, Xenia Gonzalez who facilitated the Hearing.

Also present were Bruce Whetten, Douglas Dispatch and Jesus Duarte, AYSO President.

Housing Manager, Xenia Gonzalez, presented the proposed use of entitlement funds for the 5-year entitlement cycle, as well as the proposed use of funds for the first year (FY2019) to those in attendance. The City of Douglas has identified the following categories as highest priority:

- Infrastructure/Public Improvements
- Public Facilities
- Provision of services and/or needs

HUD's allocation to the City of Douglas in CDBG funds for fiscal year 2019 is \$173,759. The funding for FY 2019 has been designated as follows: Aquatic Center Facility Improvements, to include the purchase of a de-humidifier, new roofing over the outdoor pool pump (no roof currently exists), a new pump system for the Aquatic Center and the installation of LED lighting at the basketball courts.

No negative comments were received. All persons in attendance were in agreement with the highest priority needs the City has designated.

CDBG PUBLIC HEARING

July 3, 2019

4:00 P.M. – CITY HALL COUNCIL CHAMBERS

A public hearing was held on July 3, 2019 at 4:00 p.m. in the City Hall Council Chambers, in order to present the 5-Year Consolidated Plan and FY 2019 Annual Action Plan for CDBG Entitlement funds.

City staff members present were: Finance Director/City Treasurer, Luis Pedroza; Leisure Services Manager, Jennifer Smith, Code Enforcement/Planning and Zoning Tech and Housing Manager, Xenia Gonzalez who facilitated the Hearing.

Citizens present were: Daniel Morales, Martha Morales and Rebecca Castillo.

Housing Manager, Xenia Gonzalez, presented the proposed use of entitlement funds for the 5-year entitlement cycle, as well as the proposed use of funds for the first year (FY2019) to those in attendance. The City of Douglas has identified the following categories as highest priority:

- Infrastructure/Public Improvements
- Public Facilities
- Provision of services and/or needs

HUD's allocation to the City of Douglas in CDBG funds for fiscal year 2019 is \$173,759. The funding for FY 2019 has been designated as follows: Aquatic Center Facility Improvements, to include the purchase of a de-humidifier, new roofing over the outdoor pool pump (no roof currently exists), a new pump system for the Aquatic Center and the installation of LED lighting at the basketball courts.

Ms. Castillo provided much feedback pointing out the lack of activities and/or programs for the community's "very active" senior citizens. She praised the quality and amount of activities and programs for the community's youth, stating that she would like a similar focus on providing programs and activities for the elderly. Ms. Castillo stated that she would love for the City to have a community center, where the focus between youth and elderly activities and programs are equal. She specifically requested resurfacing the tennis courts at Veterans' Memorial Park, adding that she plays tennis and enjoys an active lifestyle and would love to have activities such as shuffleboard, chess, table tennis, and other activities. Ms. Castillo was advised by staff that resurfacing the tennis courts is not an eligible CDBG expense; however, Ms. Smith, Leisure Services Manager, stated to Ms. Castillo that she is listening and is actively working on securing grant funding to do those activities that CDBG funds will not cover. Ms. Castillo then asked staff to consider putting in NEW tennis courts if that will qualify for the use of CDBG funds. She asked staff to really "fight" for this. Staff acknowledged Ms. Castillo's suggestions and thanked her for coming to the hearing and providing her input; adding new tennis courts with future CDBG funds will be something the City may consider in future CDBG funding cycles.

Mr. and Mrs. Morales suggested that the City consider constructing a median and permanent sidewalk (as part of their curbing, sidewalk and ADA ramps project) on 3rd Street and Pan American Avenue. Currently, the City has barricades in place to prevent southbound traffic from accessing the port of entry into Mexico. Mr. and Mrs. Morales live in the area and frequently use that intersection to turn east, in the direction of their home; they have had several near-collisions with vehicles traveling north-bound on Pan American Avenue from the port of entry and making what they believe to be illegal left-turns onto east-bound 3rd Street. They recommend that the City construct a median and place the proper signage to prevent north-bound traffic from turning into east-bound 3rd Street and remove the temporary barricades preventing the south-bound flow of traffic into Mexico and install permanent sidewalk, to include a beautification project to make that area more welcoming and aesthetically pleasing. Staff advised Mr. and Mrs. Morales that they would look into whether turns from north-bound traffic are illegal and if so, propose their recommendations to the appropriate staff. City Treasurer/Finance Director stated that the curbing/sidewalk/ADA ramp project proposal has not yet been finalized and the possibility of adding the recommended project by Mr. and Mrs. Morales is feasible.

No negative comments were received. All persons in attendance are in agreement with and support the highest priority needs the City has designated.

4. Public Notices

City of Douglas
Consolidated Plan
and
Annual Action Plan
Fiscal Year 2019-2023

SUMMARY OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

The Consolidated Plan for Fiscal Years 2019-2023 and Annual Action Plan for Fiscal Year 2019 for the City of Douglas has been prepared in response to a consolidated process developed by the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grants (CDBG) program.

The City participates in the CDBG program and is required to prepare and submit an annual action plan for HUD approval in order to receive Community Development Grant Funds.

The Annual Action Plan is a document for the City, which outlines how program funds will be expended during the funding cycle, and it provides a basis for assessing performance.

Federal regulations require that this summary be published in one or more local, general circulation newspapers. This summary describes the purpose and priorities of the plan, type and location of activities and the location of the complete document. Citizens have 14 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Housing Department, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 **on or before August 12, 2019.**

All citizen comments will be considered in preparing the final Annual Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Annual Plan.

Copies of the draft Consolidated Plan and Annual Action Plan will be available for inspection and review at the Housing Department office at City Hall and on the City website, www.douglasaz.gov beginning on July 12, 2019.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, a public hearing will be held at **4:00 PM on June 26, 2019.** The purpose of the public hearing is to obtain the views of citizens, public officials and agencies and other interested parties regarding the housing and community development needs of the jurisdiction. A public hearing on the Consolidated Plan and Annual Plan has been scheduled at or about 4:45 p.m. on August 14, 2019 at City Hall.

The plan lists, by level of government and by private sources, all resources and programs expected to be available to the City for use in carrying out its housing activities. Each entry includes a short description of the program or resources.

This plan sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year, determines goals for individuals and households to be served, and describes the implementation plan and geographic location of the activities to be undertaken. The formula allocation for the Community Development Block Grant program will be released mid-February. The amount of the allocation will be included in the draft document.

The preliminary draft allocation for projects for FY 2019-2023 is as follows:

- 2019: Aquatic Center Facility Improvements
- 2020: City Wide New Infrastructure - Sidewalks, Curbing and ADA Ramps
- 2021: Sewer Line Improvements
- 2022: Library Expansion/ADA Improvements
- 2023: Joe Causey Park Community Recreation Improvements

City of Douglas
Consolidated Plan
and
Annual Action Plan
Fiscal Year 2019-2023

SUMMARY OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

The Consolidated Plan for Fiscal Years 2019-2023 and Annual Action Plan for Fiscal Year 2019 for the City of Douglas has been prepared in response to a consolidated process developed by the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grants (CDBG) program.

The City participates in the CDBG program and is required to prepare and submit an annual action plan for HUD approval in order to receive Community Development Grant Funds.

The Annual Action Plan is a document for the City, which outlines how program funds will be expended during the funding cycle, and it provides a basis for assessing performance.

Federal regulations require that this summary be published in one or more local, general circulation newspapers. This summary describes the purpose and priorities of the plan, type and location of activities and the location of the complete document. Citizens have 14 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Housing Department, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 **on or before August 12, 2019.**

All citizen comments will be considered in preparing the final Annual Action Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final Annual Plan.

Copies of the draft Consolidated Plan and Annual Action Plan will be available for inspection and review at the Housing Department office at City Hall and on the City website, www.douglasaz.gov beginning on July 12, 2019.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, a public hearing was held at 4:00 PM on June 26, 2019 and **a second public hearing will be held on July 3, 2019 at 4:00 PM.** The purpose of the public hearing is to obtain the views of citizens, public officials and agencies and other interested parties regarding the housing and community development needs of the jurisdiction. A public hearing on the Consolidated Plan and Annual Plan has been scheduled at or about 5:45 p.m. on August 14, 2019 at City Hall.

The plan lists, by level of government and by private sources, all resources and programs expected to be available to the City for use in carrying out its housing activities. Each entry includes a short description of the program or resources.

This plan sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year, determines goals for individuals and households to be served, and describes the implementation plan and geographic location of the activities to be undertaken. The formula allocation for the Community Development Block Grant program will be released mid-February. The amount of the allocation will be included in the draft document.

The preliminary draft allocation for projects for FY 2019-2023 is as follows:

- 2019: Aquatic Center Facility Improvements
- 2020: City Wide New Infrastructure - Sidewalks, Curbing and ADA Ramps
- 2021: Sewer Line Improvements
- 2022: Library Expansion/ADA Improvements
- 2023: Joe Causey Park Community Recreation Improvements

5. Citizen Participation Plan

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

RESOLUTION NO. 14-1029

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE CITY OF DOUGLAS, COCHISE COUNTY, ARIZONA, ADOPTING A CITIZEN PARTICIPATION PLAN AS A PROCESS BY WHICH THE CITY'S CONSOLIDATED PLANNING EFFORTS COMPLY WITH CITIZEN PARTICIPATION REQUIREMENTS PUBLISHED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) AND IN ACCORDANCE WITH 24 CFR PART 91.105.

WHEREAS, the Mayor and Council gave staff direction at the February 12, 2014 meeting to share consulting services with the City of Sierra Vista in order to obtain direct funding allocations for HUD federal funds, which include CDBG; and

WHEREAS, the City of Douglas is now entitled to receive annual grant funding from the Community Development Block Grant (CDBG) program; and

WHEREAS, the next step in compliance with this program is to adopt a Citizen Participation Plan that sets guidelines for the City to ensure citizen involvement in the planning, implementation and evaluation of potential community needs of where the funding may be allocated; and

WHEREAS, the City of Douglas must seek this participation through a series of public notices, meetings and feedback from the community with an emphasis on participation by low and moderate income persons; and

WHEREAS, the Citizen Participation Plan includes Definitions, The Citizen Participation Process, Monitoring and Evaluation and Summary Guides for Public Notice Requirements and Substantial Amendment Criteria; and

NOW, THEREFORE, BE IT RESOLVED by the Mayor and Council of the City of Douglas, Arizona, as follows:

1. Approves the City of Douglas Citizen Participation Plan.

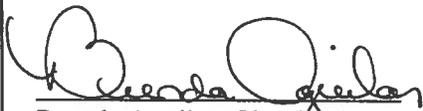
PASSED AND ADOPTED by the Mayor and Council of the City of Douglas, Arizona, this 5th day of June, 2014.



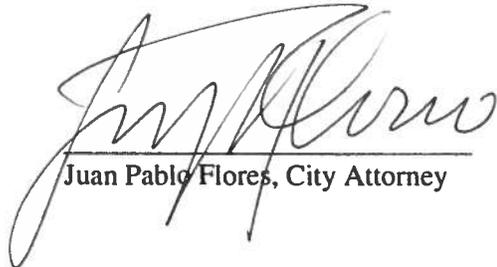
Daniel Ortega Jr., Mayor

Approved as to Form:

Attest:

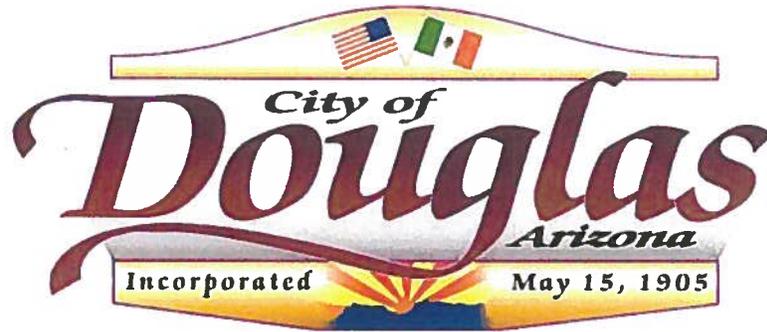


Brenda Aguilar, City Clerk



Juan Pablo Flores, City Attorney

THE CITY OF DOUGLAS, ARIZONA



CITIZEN PARTICIPATION PLAN

City of Douglas

Adopted: June 5, 2014

TABLE OF CONTENTS

- I. Introduction
- II Definitions
- III. The Citizen Participation Process
 - A. Participation
 - B. Public Hearings
 - C. Access to Meetings
 - D. Public Comments
 - E. Strategic Plan Development
 - F. Substantial Amendments
 - G. Amendments to Citizen Participation Plan
 - H. Access to Information
 - I. Relocation
 - J. Performance Reports
 - K. Technical Assistance
 - L. Complaints
- III. Monitoring and Evaluation

Table A – Summary of Public Notice Requirements

Table B – Summary of Substantial Amendment Criteria

CITIZEN PARTICIPATION PLAN

I. INTRODUCTION

The following Citizen Participation Plan provides a framework and process by which the City's consolidated planning efforts comply with the citizen participation requirements published by the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is prepared and implemented in accordance with the guidance provided in HUD Regulations 24 CFR Part 91.105.

The City of Douglas is entitled to receive annual grant funding from the Community Development Block Grant (CDBG) program. It is policy of the City to ensure adequate citizen involvement, with particular emphasis on participation by low- and moderate-income persons, in the planning, implementation, and evaluation of its housing and community development programs.

II. DEFINITIONS

Annual Action Plan: This document updates the Consolidated Plan on an annual basis and allocates one year's funding (entitlement and program income) to specific projects and activities for the CDBG program.

CAPER (Consolidated Annual Performance Evaluation Report): This document reports on the progress made in carrying out the Consolidated Plan and Annual Action Plan. The Housing Department prepares the report annually in accordance with 24 CFR Part 91.

HD: The Housing Department is responsible for administration of the HOME and CDBG programs.

CDBG (Community Development Block Grant): A HUD grant which provides for a variety of community development programs that benefit low- and moderate-income persons.

Citizen Participation Plan: The City's Citizen Participation Plan (CPP) sets forth the City policies and procedures for citizen participation for the use of Community Development Block Grants (CDBG), HOME Investment Partnership Act (HOME), and other HUD grants and funding programs. The CPP provides an opportunity for the community to work to identify needs and to allocate CDBG, HOME and other funds.

CBO (Community Based Organization): A public or private nonprofit organization of demonstrated effectiveness that is representative of a community or significant segments of a community; and which provides social, educational, or related services to individuals in the community.

Consolidated Plan: This document is submitted to HUD and serves as the planning document of the jurisdiction and application for funding CDBG and HOME. The

document is developed in accordance with 24 CFR Part 91 and sets forth the priorities and strategies of the programs for a five-year period.

Consolidated Plan Task Force: City of Sierra Vista, acting as the lead organization for the two communities, has appointed a Consolidated Plan Task Force (CPTF) to work with the planning consultant to ensure that the Consolidated Plan will be a plan suitable for adoption by the City of Sierra Vista and the City of Douglas. The Task Force includes representatives from political jurisdictions, the real estate industry, business community, faith community, low-income housing development, human service agencies, and the minority community.

HOME (Home Investment Partnership Programs): A HUD grant that provides funds to expand the supply of decent and affordable housing for low income households. Left definition in but do not address HOME in text

HUD: The U.S. Department of Housing and Urban Development.

Low- and Moderate-Income Persons: An individual from a household with a total income that does not exceed eighty percent (80%) of the median household income for the area adjusted for family size. HUD calculates and publishes the income limits yearly.

Needs Identification Analyses: The examination of current housing and community needs, identifying strategies, priority needs, and objectives for meeting housing, community development, and economic development goals. It also provides a basis for prioritizing project proposals for CDBG and HOME funding consideration.

Participating Jurisdiction: The participating jurisdiction is the City of Douglas.

Program Monitoring Policies: The City has developed and implemented policies to monitor the use of funds and to measure the progress and effectiveness of grant programs. These policies are in accord with HUD requirements.

Program Year: The twelve month period in which HUD funds are to be spent for eligible activities; usually the period beginning July 1 and ending June 30.

Proponent: An entity that has or is considering submission of a proposal for the use of CDBG funds

Public Meeting: A meeting in which the members of the public exchange their ideas on a particular issue and provide the sponsoring entity with their views on the subject at hand. Though the meeting may be attended by elected officials, no formal actions are taken.

Public Hearing: A formal opportunity for a governing body or other entity to receive public opinion on subjects that may require action. Notices of public hearings are advertised through various forms of media.

Relocation: The movement of a person as a direct result of the implementation of federally assisted acquisition, demolition, conversion, or rehabilitation activities.

Sub-recipient: A public or private nonprofit agency, authority or organization, or a for-profit entity receiving funds from the grantee or another sub-recipient to undertake activities eligible for assistance. The term does not include contractors providing supplies, equipment, construction or services subject to the procurement requirements in 24 CFR 85.36 or in 24 CFR Part 84, as applicable.

Substantial Amendment: A substantial amendment is a change to the jurisdiction's planned or actual activities as published in the Consolidated Plan or Annual Action Plan. The City has established and published in the Citizen Participation Plan thresholds to define what constitutes a substantial amendment

III. THE CITIZEN PARTICIPATION PLAN FOR THE CITY ADDRESSES EACH OF THE FOLLOWING ELEMENTS:

A. Participation

It is the policy of the City to encourage and facilitate the wide-range participation of residents, service providers, government agencies, and others in the development of all HUD required consolidated planning documents including the Five-Year Consolidated Plan, Annual Action Plans, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER).

The primary purpose of the participation will be in needs identification, priority setting, funding allocations, and program recommendations related to the consolidated planning process. The City shall provide for and encourage citizen participation with particular emphasis on:

- Low- and moderate-income persons;
- Persons residing in predominantly low- and moderate-income neighborhoods or slum and blighted areas; and
- Persons residing in areas where the use of CDBG funds is being proposed.

The primary purpose of the HUD programs covered by this Citizen Participation Plan is to improve communities by providing decent housing, a suitable living environment, and growing economic opportunities. The City encourages the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

MEETING THE NEEDS OF NON-ENGLISH SPEAKERS 24 CFR 91.105 (e)(4)1

There are significant populations of monolingual, Spanish-speaking persons residing in some of the very low-, low-, and moderate-income communities. The Housing Department (HD) will provide a bilingual staff member at all Citizen Participation meetings when such a need is anticipated. HD will make every effort to ensure that Limited English Proficient persons have meaningful access to federally funded program and services and written materials. The forms and flyers announcing Citizen Participation Meetings will be offered in Spanish as appropriate.

B. Public Hearings

The City must conduct at least two public hearings per year to obtain the views and comments of residents, service providers, government agencies, and other stakeholders regarding the HUD-funded programs in the participating jurisdiction's HUD program area. The hearings generally address housing, social, and community development needs; proposed activities; and the review of program performance. The hearings will be conducted at a minimum of two different stages of the program year – at least one of these hearings must be held prior to the adoption of the proposed Consolidated Plan and/or Annual Action Plan. The second public hearing is usually conducted in conjunction with the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER).

Citizens must be given adequate notice of all hearings and meetings through advertisements in the newspaper of record and/or other publications of general circulation, serving the community of affected citizens. Public hearings and community meetings will be advertised at least 14 calendar days in advance of the hearing and/or at the beginning of the official public comment period, whichever occurs first. Public notice shall indicate the date, time, place and purpose(s) of the hearing or meeting as well as disclose information that will contribute significantly to the public's understanding of the issues to be discussed at the hearings or meetings. The notices will also be posted on the City of Douglas Website www.douglasaz.org. Additional means of advertising will be utilized, as appropriate, including, but not limited to: mailing flyers, distributing or posting notices at libraries, parks, and other public areas; placing radio public service announcements; developing press releases; and sending notices to community organizations. In areas where the City has determined that there is a substantial non-English-speaking population within its jurisdiction, the hearing or meeting notice will be published in English and in the appropriate other language.

The City will also follow the above public noticing process for other “non-public hearing” HUD related actions to be taken by the City Council.

The hearings will be held at times and locations convenient to potential and actual beneficiaries, with accommodation for persons with disabilities. When the need is anticipated, or it is requested, language translation services shall be made available.

Table A, at the end of this document, summarizes the public notice requirements for the various reports and documents

The participating jurisdictions are required to conduct their own Citizen Participation activities for their residents, especially low-and moderate-income residents. At a minimum, these cities will publicly notice and hold at least one public meeting to discuss proposed uses of the HOME grant fund allocation.

C. Access to Meetings

It is the policy of the City to plan and conduct public meetings related to the Consolidated Plan and Annual Action Plan in participating jurisdictions. These meetings shall be held at times and locations convenient to potential and actual program beneficiaries. When appropriate, these public meetings are to be conducted as part of regularly scheduled meeting of another community-based entity. The use of an existing

community-based forums for the public meetings enhances the potential for acceptable turn-out of residents, service providers, government officials, and other stakeholders.

As part of the Fiscal Year 2014/2015 through Fiscal Year 2018/2019 Consolidated Plan effort, a series of Needs Identification meetings will be conducted to invite input from public agencies and other interested parties regarding housing and community development issues, needs or problems; to provide information on the consolidated planning process and applicable grant program; and to encourage the submission of project proposals. Attendees will also be given the opportunity to fill out Needs Assessment Surveys. Prior to public meetings, notices will be published in newspapers of general circulation – including Spanish – announcing the purpose, date, time, and location of the meetings. All meetings will be held in locations accessible to persons with disabilities with additional accommodations available upon request. When the need is anticipated or it is requested, language translation services shall be made available for non-English speaking residents.

D. Public Comments

It is the policy of the City to provide residents, service providers, government agencies, and other stakeholders a sufficient time period (not less than thirty (30) days to review and comment on proposed Consolidated Plan, Annual Action Plans, and Substantial Amendments and not less than fifteen (15) days to review and comment on the Consolidated Annual Performance and Evaluation Report (CAPER). All public notices invite interested persons to submit comments. Contact information will be provided on all public notices, at public meetings as well as on any of the documents or materials being considered. All comments will be reviewed and considered. All documents presented for public comment will include a summary of all comments received during the public comment period and a summary of comments not accepted and the reasons therefore.

E. Strategic Plan Development

Public meetings and hearings for development of the Consolidated Plan shall be held with representatives of participating jurisdictions, public agencies, and organizations, as well as interested citizens. During the preparation of the Consolidated Plan, meetings are held to consider the regional strategy for the use of the City's CDBG funds. These meetings shall confirm the development planning process and will be held to obtain citizen views and proposals on needs and priorities for a consistent strategy.

The following program information will be provided to the public:

- a. The estimated amount of HUD grant funds available to the jurisdiction including program income for community development and housing activities;
- b. The eligible program activities that may be undertaken with these funds;
- c. The areas and locations proposed for utilizing the available funding; and
- d. The proposed allocation of federal funds to participating non-profit organizations, participating jurisdictions, and basic eligible program categories and proposed funding allocations for local funding programs.

F. Substantial Amendments

From time-to-time, it may be necessary for the City to process a “substantial amendment” to the Five Year Consolidated Plan or an Annual Action Plan to allow for new CDBG funded activities; modification of existing activities; or other program administrative actions.

Any proposed amendment that is considered a “substantial amendment” is subject to the Citizen Participation process, requires formal action by the City Council, and approval by HUD. A thirty (30) day public notice is published to provide the opportunity for the public to review and comment on the proposed substantial amendments. The City will consider all comments or views received from the public concerning proposed substantial amendments in accordance with 24 CFR 91.105 (c)(3). A summary of these comments and views, including comments or views not accepted (and the reason why) shall be attached to the substantial amendment.

The City is required by HUD [24 CFR 91.505 (b)] to identify the criteria to be used in determining if a proposed action will be considered a *Substantial Amendment*. The following criteria will be used by both the City – if any one criterion applies, a substantial amendment will be required:

1. A new activity not previously listed and described in the Consolidated Plan/Annual Action Plan;
2. When a proposal is made to amend the description of an existing activity in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original activity’s purpose, scope, location, or beneficiaries; or
3. An increase in the amount of CDBG funds allocated to an existing activity when the following apply:
 - a. an increase in funding for a CDBG public service-type activity in an amount greater than \$50,000, or a 100% increase over the current funded amount, whichever is greater;
 - b. an increase in the funding for other activities (public facility improvements, code enforcement, acquisition, etc.) in an amount greater than \$100,000, or 100% increase over current funded amount, whichever is greater; or

A matrix (Table B) at the end of this document summarizes these criteria

4. In an effort to efficiently utilize CDBG funds, the City will consider the reprogramming of unspent CDBG balances from completed and cancelled CDBG-funded activities to other eligible activities. Activities under the stated thresholds may be cancelled for cause and funds reprogrammed without resulting in a substantial change. Examples of cause are:
 - a. cancellation requested by the sub-recipient
 - b. determination of HD that insufficient funding prevents accomplishment of the activity

- c. determination by HD that the project cannot be carried out in a timely or eligible manner.

In the event that any of “administrative” reprogramming actions are over the threshold limits, and come under the “substantial amendment” criteria, the proposed actions are subject to the Citizen Participation process, will require formal action by the City Council, and notification to HUD.

Substantial amendments will be considered twice in each program year. These changes will be made in the spring and in the fall.

In the event of a declared emergency, it may be necessary to reprogram funds to meet urgent community needs. In these situations, requirements related to public notice and public comment period may be suspended.

G. Amendment to Citizen Participation Plan

During the administration of the HUD programs, it may become necessary to amend the Citizen Participation Plan. Any proposed amendment to the Citizen Participation Plan requires a thirty (30) day public notice, formal action by the City Council, as appropriate, and approval by HUD.

H. Access to Information

The City shall provide opportunities for residents, public agencies, and other interested parties, including those most affected, with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan.

Standard documents will be available for public review at the City of Douglas, 425 E. 10th Street, Douglas, AZ 85607, and the web site, www.douglasaz.org. These materials will also be available in a form accessible to persons with disabilities, upon request. A reasonable number of free copies of the plan will be provided to citizens and groups that request it; additional copies may be obtained on a first come, first serve basis from City of Douglas in accordance with City of Douglas' fee policy for copies. Comments, questions or suggested amendments should be directed to Xenia Gonzalez, Housing Manager.

Standard program documents that shall be made accessible for public review and comment throughout the preparation process include: the proposed and final Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Report (CAPER), Substantial Amendments, and this Citizen Participation Plan.

It is the policy of the City to maintain and provide access to all applicable and appropriate records pertaining to the administration of the CDBG and HOME programs. Records retention is a component of the City's HUD Program File Management System. Accordingly, the City will maintain and provide access to documentation and records for a period of five (5) years.

I. Relocation

The City policy is to administer the Community Development Block Grant program without displacement. In the event displacement is unavoidable, the City and/or other responsible party(s) will comply with the regulations of the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, and Section 104(d) of the Housing and Community Development Act of 1974, as amended.

Consistent with the goals and objectives of activities assisted under the Act, the City of Sierra Vista and or the City of Douglas will take appropriate steps to minimize the direct and indirect displacement of persons from their homes.

J. Performance Reports

Each fiscal year the City is required to prepare and submit a performance report to HUD for the previous program year. The information compiled in this document is necessary to assess the progress on funding received by the two entities, participating jurisdictions, sub-recipients and other agencies or organizations. Data collected in the compilation of the performance report will be used to supply information to HUD and the public on the accomplishments and services provided. The information will include the number of people served, ethnicity, income category, objective and outcome, and type of service received, as well as the current status on housing, public facilities and improvements, and other projects. The information is also used to determine future funding considerations.

The City will conduct the second required public hearing before the City Council to review the Consolidated Annual Performance and Evaluation Report (CAPER). The final performance report will be available to citizens for review and comment at least 15 days prior to submission to HUD. The hearing will be advertised in the adjudicated newspaper and/or other targeted publications of general circulation in English and Spanish at least 14 days in advance of the hearing and/or at the beginning of the official public comment period, whichever occurs first, so that citizens will be provided reasonable notice to review and present comments on performance reports. A copy of the CAPER will be available at City of Douglas for review and can be located on the following web site: www.douglasaz.org. The CAPER shall be submitted to HUD within ninety (90) days after the end of the program year. Final reporting documents will also be made available to any interested parties upon request.

K. Technical Assistance

Technical assistance is available as necessary to groups and organizations representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under the Consolidated Plan.

The City will make technical assistance available to current subrecipients and potential proponents through City of Douglas Housing staff, who are the main source of information of HUD programs and the application process. City of Douglas Housing staff provides assistance at community meetings and during proposal preparation, evaluation, review, and monitoring. The City has implemented mandatory proposal and sub-recipient training, which provides background and understanding of the programs and processes. Although the staff members are the primary contact to the communities and service providers, all HD resources will be made available.

L. Complaints

Residents or other interested parties may submit complaints to the City in relation to administration of the HUD-funded programs. Complaints may be made in writing to: City of Douglas, 425 E. 10th Street, Douglas, AZ 85607. City of Douglas will receive, log-in and file all written complaints and grievances. A letter responding to each complaint or grievance will be written and sent to the party or parties from whom the complaint or grievance was received.

The complaining party should state the nature of the complaint, what prior efforts have been made to resolve the problem and any other pertinent information which would help staff determine a solution. All complaints will receive careful consideration and a timely, substantive response will be provided within fifteen (15) working days.

IV. MONITORING AND EVALUATION

In accordance with HUD program regulations, the Housing Department continually monitors all HUD-funded sub-recipients and their activities. The City Program Monitoring Policies were developed to ensure compliance with 24 CFR 570.502 (CDBG) and 24 CFR Part 85.40 (a) which provides for the general program monitoring responsibilities of the City in the administration of the HUD-funded programs.

It should also be noted that grantees are responsible for managing the day-to-day operations of grant and sub-grant supported activities. Grantees must monitor grant and sub-grant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function, or activity.

TABLE A

CDBG Public Notice Summary				
Type of Document	Public Hearing	Hearing Notice	Public Comment Period	Notices in Public Areas
Consolidated Plan and/or Annual Action Plan	1-2	Run a display notice in newspapers at least 14 calendar days prior to <u>each</u> hearing or at the beginning of the public comment whichever is first.	30 day public comment period ending upon Council approval of the item.	Post notice listing all meetings/hearings for the planning/adoption phase with enough detail for the public to recognize the purposes of the meetings, draft document locations and dates for comment periods
Substantial Amendments to Consolidated Plan and/or Annual Action Plan	2 (Spring & Fall depending on the need.)	Run a display notice in newspapers at least 14 calendar days prior to <u>each</u> hearing or at the beginning of the public comment whichever is first	30 day public comment period ending upon Council approval of the item.	Post notice describing amendment items and location of drafts for public review & comment
Annual Performance Report/CAPER	1	Run a display notice in newspapers at least 14 calendar days prior to the hearing or at the beginning of the public comment whichever is first	15 day public comment period ending upon Council approval of the item.	Post notice identifying purpose of hearing, comment period, & location of drafts for public review and comment
<ul style="list-style-type: none"> ▶ Display ads will be run in the adjudicated newspaper and/or in other key publications in the affected areas. ▶ Documents and drafts for public comment will be available on the City of Douglas Website, which will also provide updates to the process and links to other information. 				

TABLE B

SUMMARY OF SUBSTANTIAL AMENDMENT CRITERIA				
1) An activity not previously listed or described in the Consolidated Plan or Annual Action Plan				
2) Amending an existing activity so that the new purpose, scope, location ,or beneficiaries differ significantly from the original activity				
3) For a funding change or cancellation to an existing CDBG public service activity	The greater of:	An increase of more than \$50,000	or	A 100% increase over current funding
4) For a funding change or cancellation of an existing CDBG activity such as code enforcement, public facilities improvements	The greater of:	An increase of more than \$100,000	or	A 100% increase over current funding