

CITY OF DOUGLAS



CDBG

DRAFT CAPER

FY 2019-20

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The annual goals and objectives for the 2019-2020 year of entitlement were targeted towards public facility improvements at the Aquatic Center located at 1551 E. 15th Street, within Census Tract 8 of Douglas City limits. The proposed projects include: new pool pump, pump room, LED lighting for the basketball court, and a dehumidifier.

- Participation and outreach was conducted via public meetings and public hearings to determine pressing community needs.
- Established and submitted the Annual Action Plan to HUD for approval.

Progress has been made on the proposed projects, installing the pool pump prior to the end of the fiscal year (June 30, 2020). Work has continued on the proposed projects and, while not done by the end of the program year, the LED lights project has been completed as well. Staff continues to work on the remaining activities and we are confident that all will be finalized soon. We are committed to ensuring that entitlement funds are used in a manner that best benefits the citizens of our community. The City has been devoting substantial staff time to maximize our ability to use grant funds and remain in compliance with grant requirements.

The goals and objectives for the CDBG-CV funding were established to provide public services to prepare for, respond and prevent Coronavirus. No activities using CDBG-CV funds were utilized prior to the end of the program year; however, significant progress has been made, to date, in providing funds to local area non-profits for the purposes of providing food services, rent/mortgage/utilities payment assistance and to cover the costs for community Covid-19 testing.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)
Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual - Strategic Plan	Percent Complete	Expected - Program Year	Actual - Program Year	Percent Complete
Administration/Planning	Program Administration	CDBG: \$	Other	Other	0	0				
Emergency/Disaster Response	Emergency/Disaster Response - COVID-19 CARES Act Funding	CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1367	1014	74.18%	1367	0	0.00%
Emergency/Disaster Response	Emergency/Disaster Response - COVID-19 CARES Act Funding	CDBG-CV: \$	Homelessness Prevention	Persons Assisted	183	145	79.23%	183	0	0.00%
Provision of Needed Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5	2	40.00%			

Provision of Needed Services	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	5	2	40.00%			
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	21152	7874	37.23%	7874	1969	25.01%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

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.

CDBG funds will be used for public investment in facility and infrastructure improvements that benefit low- and moderate-income neighborhoods.

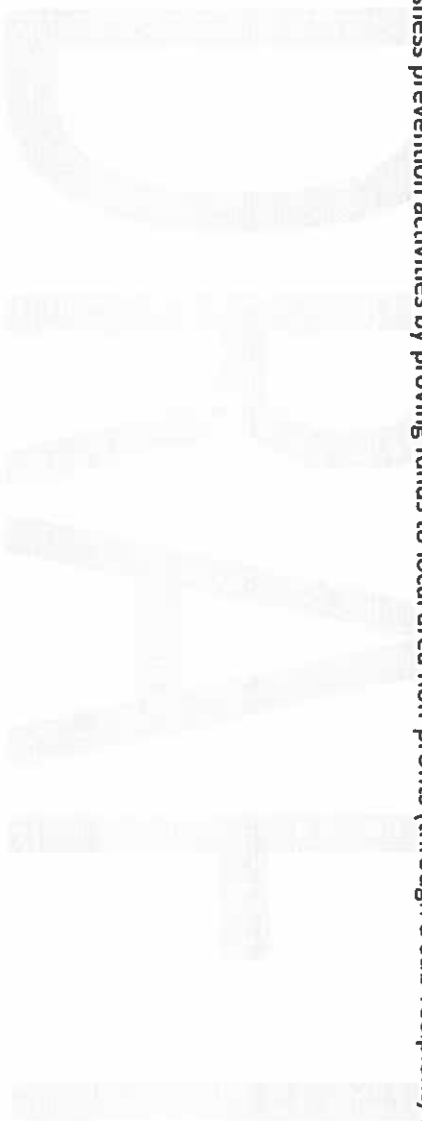
For the 2019/2020 Annual Action Plan, City of Douglas will provide indirect assistance to low- and moderate-income areas of the City in addition to improving the City as a whole. Assistance will be made available citywide to persons meeting the CDBG eligibility requirements for low- and

moderate-income benefit.

During the 2019/2020 program year, the City will fund improvements to the Aquatic Center Facility.

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

The City of Douglas substantially amended its Program Year 2019 Annual Action Plan as well as the 2019-2023 Consolidated Plan to include a new goal in response to the Covid-19 pandemic - Emergency/Disaster Response. The goal is to provide assistance through public service activities and homelessness prevention activities by providing funds to local area non-profits (through a sub-recipient) during a nationally-declared emergency.



CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	0
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	0
Hispanic	0
Not Hispanic	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The project activities for a LMI area benefit; we have information on the low- to mod-income population within the designated LMI areas for the community that we serve. The table on the preceding page reflects the total persons served as a percentage of the project completion total.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	173,759	117,185
Other	public - federal	101,580	0

Table 3 - Resources Made Available

Narrative

The projects for CDBG FY19 began implementation and partial completion during the program year. The new pool pump was installed during the program year; equipment and materials for the remaining activities were ordered as per manufacturer requirements and a schedule for the completion of activities was completed by staff. Staff also obtained quotes for the remaining work to determine if any activities could be done using City staff and labor.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide		100	Activities that benefit low/mod and all residents

Table 4 – Identify the geographic distribution and location of investments

Narrative

CDBG FY19 focused on activities that benefit low/mod and all residents.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

A large portion of FY2019 funds were expended during the grant year, in preparation for the work to be performed. The City of Douglas did not obtain any additional resources for the projects but provided leveraging by absorbing much of the labor costs using City staff to perform much of the initial work on the public facility improvements. City staff and contractors have been working very hard on completing the activities for the program year.

In addition, the City finalized all pending work on FY2017 projects/activities and made use of that program year's resources. FY2017 projects/activities have been completed.

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CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

CDBG FY19 funding has been allocated towards public facility improvements to improve/revitalize neighborhoods. The City's goal for 2019 was to make improvements to the Aquatic Center to offer improved amenities for use by all of the City's residents. The Aquatic Center is located in Census tract 8 of the City of Douglas, which is one of the low-mod Census Tracts in the City. City staff are currently working on finalizing the activities for this project and expects completion of all pending activities in the next quarter.

CDBG-CV funding is actively being used in public service activities to help prepare for, respond and prevent Coronavirus. The City is committed to completing all proposed activities, utilizing all of the funding that has been allocated for these purposes.

Discuss how these outcomes will impact future annual action plans.

The City will continue to work towards eliminating barriers to affordable housing by improving the infrastructure of antiquated neighborhoods, thereby improving the value of homes and neighborhoods. Allocation plans for the funding year include public facility improvements to the Aquatic Center to include a new pool pump, new dehumidifying system, LED exterior lighting to include adjacent basketball courts and a roof for the pump room.

The City is also committed to ensuring that all CARES Act allocations are utilized efficiently and effectively while providing much-needed relief through public service grants to our local community and its residents.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

The City is using CDBG FY19 funds to complete public facility improvements to the Aquatic Center. The City’s focus remains on making improvements to areas that will benefit the community’s residents as a whole. The upgrades to the Aquatic Center facilities will greatly improve one of the recreational areas in the community visited and enjoyed by thousands of residents living within the designated low- mod areas within our City.

The City feels that it is imperative that the focus remains on the public facility and infrastructure aspects of the plan. The City continues to believe that meeting these basic needs will help build a strong, safe, and healthy community that will, hopefully, encourage a variety of economic opportunities and contribute to an enhanced quality of life for the residents, particularly the low and moderate-income residents.

CDBG-CV funds will be expended entirely for the purposes/activities identified in the Substantial Amendment to FY Annual Action Plan and Consolidated Plan 2019-2023.

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CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City is constantly 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 require a wide range of specialized services and the City does not possess the resources to address this problem at this time. The City relies upon other entities to provide services such as housing, mental health counseling, employment training and case work services. There is one shelter in the city which is targeted towards men, women and children who are victims of domestic violence. The closest homeless shelter is in Bisbee, Arizona which is approximately 30 miles from Douglas.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works in partnership with the House of Hope Domestic Violence Crisis Shelter in providing their residents with a preference point on the Section 8 Housing Choice Voucher waiting list. The Cochise County Housing Authority provides housing assistance to homeless veterans through their VASH program. Veterans can use those vouchers within Cochise County, including the City of Douglas. St. Vincent de Paul, a local non-profit agency, also offers emergency lodging assistance to homeless persons. The City of Douglas Housing Department provides referrals for the services mentioned here to all homeless persons who contact the housing office for information.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

As mentioned above, the City works in partnership with several agencies who provide these services. In addition, the City has in the past, administered the Housing Rehabilitation and Emergency Home Repair programs which are aimed at helping low income residents make necessary repairs to their homes in order to avoid becoming homeless. These programs have been put on hold due to lack of funding.

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 of Douglas Public Housing Authority (PHA) offers preference points for elderly/disabled residents, veterans, victims of domestic violence, and involuntarily displaced residents. This helps them transition into permanent housing more quickly than applicants who do not qualify for these preference points.

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CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City does not have any public housing developments.

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

N/A

Actions taken to provide assistance to troubled PHAs

The City of Douglas PHA is in good standing with the U.S. Department of HUD and is not a troubled PHA.

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CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

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.

In order to facilitate the development of affordable housing, the City may consider assisting developers by waiving or deferring impact fees.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

As mentioned above, the City of Douglas has worked in partnership with several developers in order to seek permanent funding for the construction of family affordable housing apartment complexes. The Douglas Housing Corporation I (DHC I) provides residents of two affordable housing apartment complexes with supportive services programs.

The City is actively continuing to provide Emergency Rental Assistance to local eligible households using FY16 CDBG funds. A portion of the CDBG-CV funds is actively being utilized on homelessness prevention by providing mortgage/rent/utilities assistance to local households whose ability to pay has been impacted by the Covid-19 pandemic.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The primary objective is the provision of a suitable living environment and the provision of services for low and moderate income persons. This includes a wide range of programs and activities, focusing on housing conditions and infrastructure improvements. The City of Douglas Housing Department regularly provides information to owners/landlords on lead-based paint hazards and enforces lead-based paint requirements for all households receiving Section 8 assistance through the Section 8 Housing Choice Voucher program.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Economic Development is crucial to the growth and revitalization of Douglas. Improvement of infrastructure is necessary in order to attract new businesses to the community. The City's infrastructure is older and in need of upgrades to make the City attractive for business expansion and development. Public Facility and Infrastructure improvements are a large focus of CDBG activities for the entitlement cycle 2019-2023.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Douglas Housing Department is the lead agency for Consolidated Plan activities, and has developed working relationships and contacts with several service providers, non for profit organizations, housing developers and agencies at the state, regional and local levels.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Douglas does not have any public housing; however, as mentioned before, has developed programs for Housing Rehabilitation, and Emergency Home Repair (both are currently un-funded) and works in partnership with several agencies that provide social and housing services.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Impediments identified were as follows: 1) Need for increased awareness, outreach and education regarding Fair Housing. The City of Douglas Public Housing Authority (PHA) displays fair housing materials at City Hall, and provides free copies of materials to the public. In addition, the Mayor of the City issues a Fair Housing proclamation every year in April, which is identified as National Fair Housing month. The PHA, through coordination with the Fair Housing Council of Tucson, Arizona, offers Fair Housing training workshops to local residents, housing providers and realtors. The Fair Housing logo is included in all of the PHA's correspondence and forms.

2) Limited supply of affordable housing. The City will continue to use all available federal and state resources and programs to address high priority housing needs for rehabilitation, preservation, and development of affordable housing units. Currently, the City of Douglas PHA administers approximately 193 Section 8 Housing Choice vouchers.

3) Government Policies. Impediments here were deal with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. Partnerships with developers, such as the partnership formed to build Sun Ray Family Apartments, in which the City obligated funds from the General Fund towards its development and deferred development fees, serve as an incentive for future development of affordable housing.

4) Awareness of Potential Discrimination. Although no specific incidents of discrimination have been noted, the Analysis of Impediments identified potential discrimination due to the age of the City's housing stock which may cause potential discrimination incidents in the rental market. Disabled persons may face discrimination or difficulties in finding appropriate housing due to the small number of adaptable units. Also, there is a high percentage of family households that are slightly larger in size than the national norm, indicating a demand for larger housing units. The recommendation here is to increase housing choice alternatives for the disabled families and families with children by encouraging

the construction of affordable, and especially rental housing.

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CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

For contract years FY 2019-2023, the City does not anticipate having any sub recipients of CDBG entitlement funding (regular CDBG funds). All projects will be done in-house. The City of Douglas Housing Department is the lead office which will monitor the progress of all projects, with the assistance of the Finance Director, who will monitor spending and budget allocations. We will continue to monitor our progress and comply with completing the required projects and financial reporting.

For program year 2019, the City entered into a sub recipient agreement with a non-profit agency. The agency is responsible for the distribution of CDBG-CV funding to local non-profits to undertake public service activities to prepare for, prevent or respond to the Covid-19 pandemic. The sub-recipient is responsible for the collection of documentation requirements and reporting directly to the City of Douglas Housing Department. The City of Douglas will monitor the progress of all projects, with the assistance of the Finance Director, who will monitor spending and budget allocations. We continually monitor all progress and comply with completing the required projects and financial reporting.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City has implemented a Citizen Participation Plan, and has worked continuously with the public and community leaders and stakeholders to determine the most pressing needs of the community in setting up the Five Year Plan. The public is given notice of all public meetings, public hearings and how to participate in the public review and comment periods via published notices in a local distribution newspaper and the City's website.

The Citizen Participation Plan was recently amended to apply the waiver for public participation due to the Covid-19 pandemic. The City of Douglas requested and received approval from HUD to modify the way public participation is available and reducing the public review and comment period to 5 days for any amendments to the plan to include the use of CARES Act funds. The public was given the

opportunity to attend the public hearing via virtual meeting and provide all comments via email or written form during the public review and comment period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

A change was required to the City of Douglas program objectives due to the Coronavirus pandemic. On March 27, 2020 HUD issued notice that all entitlement communities would receive a special allocation of CARES Act funds (CDBG-CV) funds to prepare for, prevent and respond to the Coronavirus pandemic. The City of Douglas submitted a substantial amendment to FY19 Annual Action Plan, Consolidated Plan 2019-2023 and Citizen Participation Plan to include Emergency/Disaster Response - Public Services Covid-19 Activities. The City of Douglas has been diligently working to complete all FY19 projects and intends to fully carry out and complete all proposed activities using CDBG and CDBG-CV funds.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.