

April 2023

Annual Action Plan for CDBG Program Year 2023/2024 - DRAFT

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



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AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The 2023 Annual Action Plan 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 its formula grant programs.

The City participates in the CDBG program and is required to prepare and submit an action plan for HUD approval in order to receive Community Development Grant Funds. This Annual Action Plan serves as an application for federal funds under HUD's formula grant programs and provides a basis for assessing performance.

The Annual Action Plan is developed in a manner specified by HUD, and the city has followed the prescribed format in completing the plan. The 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.

This section constitutes the 2023 Annual Action Plan of the Five-Year Consolidated Plan. It sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year (July 1, 2023 – June 30, 2024), 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 is \$165,619.

2. Summarize the objectives and outcomes identified in the Plan

The needs in the city are numerous and varied. The principal needs identified in the Consolidated Plan for 2019-2023 are:

1. Public facility and infrastructure improvements;
2. Public facility improvements and upgrades;
3. ADA accessibility to public facilities and amenities;
4. Park improvements;
5. Decent housing - retain affordable housing stock and increase the availability of affordable housing especially to assist homeless persons and persons at risk of becoming homeless; and;
6. Economic development

In the previous four years of the City's Consolidated Plan the city focused on public facility and infrastructure improvements to the City's Aquatic Center, Sidewalks/Streets, and Joe Causey and Raul Castro Park Improvements.

For FY 2023, the City's focus will continue to be on public improvements to benefit the City's low- and moderate-income neighborhoods. The proposed public facility sewer improvements for FY2023 will take place on 15th street between A and B Avenues.

In the future, the city feels it is imperative that the focus remains on the public facility and infrastructure aspects of the plan. The city believes 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.

All costs associated with the project have been taken into consideration and are accounted for in the preparation of the action plan.

3. Evaluation of past performance

The city is currently working from its most recent five-year strategic planning document, Consolidated Plan 2019/2020-2023/2024. The Plan outlines the City's high priority needs and projects for primarily the low- and moderate-income persons in the city which includes public improvements/infrastructure and public facilities. In pre-2019 program years, the city implemented the programs outlined in the Consolidated Plan 2014-2018.

The priority needs identified in the 2014/2015-2018/19 Consolidated Plan included public improvements to revitalize neighborhoods; rehabilitate housing for owner and renter units; assist the homeless, extremely low-income households threatened with homelessness, and programs for the youth and elderly.

The Action Plans 2014-2018 targeted infrastructure projects, housing rehabilitation and emergency rental assistance targeted for homelessness prevention, public facilities improvements to benefit the City's youth (replacement of playground equipment in one of the City's major parks located within a low- and moderate-income neighborhood), and the establishment of a community center to benefit all area residents, with a focus on programs for the youth and elderly population. Projects for 2014, 2015 and 2017 are 100% complete. 2016 projects - Housing rehabilitation of four (4) homes of elderly/disabled homeowners is 100% complete; staff is actively working to qualify households in imminent danger of becoming homeless for the emergency rental assistance funding from this program year. FY2018 proposed community center project was not feasible within a reasonable timeframe.

Instead, the city submitted a proposal to HUD to amend the 2018 Action Plan to include improvements to our Veteran's Park that include shading over the new playground equipment, lighting and a new pump for our city pool enhancing programs for the youth and elderly.

The 2019/2020-2023/2024 Consolidated Plan will be targeting public facility and infrastructure improvements that benefit low- and moderate-income areas and households. As stated previously, in FY 2019, 2020, 2021 and 2022, the city focused on public facility and infrastructure improvements to the City's Aquatic Center, Sidewalks/Streets, and Joe Causey and Raul Castro Park Improvements.

The city feels it is imperative that the focus remains on the public facility and infrastructure aspects of the plan. The city believes 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.

4. Summary of Citizen Participation Process and consultation process

The city employs diverse methods to encourage on-going participation from residents, community service providers, and existing and potential community development partners. The participation process for the Annual Plan included public notices; a 30-day public comment period; two public hearings; and consultation with City staff and elected officials. In the end, the planning process yielded the active involvement and input of citizens, stakeholders, and governmental departments.

The FY 2023 Annual Action Plan does not deviate from the current Five-Year Consolidated Plan Document and Strategic Plan for 2019-2023.

5. Summary of public comments

As described above, the public had opportunities to provide input on the Annual Action Plan. A public hearing was held on April 6, 2023. The Annual Action Plan was made available to the public for review for a 30-day minimum comment period, beginning April 10, 2023, through May 10, 2023. A second public hearing was held on May 10, 2023, to discuss and adopt the Annual Action Plan.

[Insert #] public comments received at the Public Hearings on April 6, 2023. [Insert #] public comments were received during the public hearing held on May 10, 2023. [Insert #] public comments were received during the public review and comment period from April 10, 2023 – May 10, 2023.

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

None

7. Summary

Please see the preceding responses, as they address the key points.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Table 1. Responsible Agencies		
Agency Role	Name	Department/Agency
CDBG Administrator	DOUGLAS	City of Douglas Housing Department

2. Narrative (optional)

The Housing Department is the lead agency for the implementation of the Annual Action Plan, as well as the responsible party for the processing and distribution of federal funds under the CDBG program, once allocated by the federal government and approved by the City Council.

Other offices and agencies responsible for executing and administering programs covered by the Annual Action Plan include Deputy City Manager, the Finance Department, and the Public Works Department.

3. Consolidated Plan Public Contact Information

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Douglas, Arizona 85607
(520) 458-7871
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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The city employs diverse methods to encourage on-going participation from residents, community service providers, and existing and potential community development partners. The participation process for the Annual Action Plan included public notices; a 30-day public comment period; and two public hearings. In the end, the consolidated planning process yielded the active involvement and input of both governmental departments and citizens.

2. Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The City of Douglas Housing Department transferred its Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County, effective January 1, 2023. Moving forward the City will provide referrals to the Housing Authority of Cochise County for those interested in the Section 8 Housing Choice Voucher program.

Priority is given to extremely and very low-income residents. In addition, waiting list preferences are offered to applicants as follows: Veterans and Elderly/Disabled households; local preferences as follows: Working Families (20+ hours per week), Resident of City of Douglas, Victims of Domestic Violence and Involuntary Displacement due to disaster (i.e., fire). The Housing Authority of Cochise County administers county-wide assistance (to include the City of Douglas) of two additional programs; HOPWA (Housing Opportunities for People With Aids) and VASH (Veterans Administration Supportive Housing) through collaboration with the Veterans Administration, which is targeted to assist homeless veterans throughout Cochise County.

The city has also worked in collaboration with the Catholic Community Services, "House of Hope" Domestic Violence Crisis Shelter, by offering a preference on the Section 8 waiting list to women and their children who have been victims of domestic violence.

During this Five-year Consolidated Plan period, the city is developed greater coordination between all active agencies in Douglas in an effort to minimize any duplication of efforts. Efforts to enhance coordination between the public and private sector will ensure that needs are being properly addressed and that resources are being maximized.

As needed, the city will provide technical assistance and information to private and public organizations that seek to provide affordable housing and support services to residents of Douglas.

There are currently 11 affordable housing apartment complexes located within the city limits of Douglas.

3. 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 participates in the Balance of State Continuum of Care Meetings that the Arizona Department of Housing hosts on a quarterly basis. Efforts are being made to further build contacts and relationships with local, county, and regional entities to support and implement CDBG programs.

- 4. Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Not Applicable. The city does not receive ESG funding.

- 5. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

As shown within Table 2, the City of Douglas has consulted with a number of agencies in the implementation of the 2019/2020-2023/2024 Consolidated Plan goals. This includes social service and housing agencies. Additionally, through the administration of the CDBG-CV funding recently received, the city has been working with a number of public service agencies including Meals on Wheels, St. Vincent Depaul, and United Way. Services being provided include, but are not limited to, food assistance, rent/mortgage/utility assistance, and virtual learning.

Table 2. Agencies, Groups, Organizations Who Participated

1	Agency/Group/Organization	City of Douglas Department of Public works
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Infrastructure & Public Facilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
2	Agency/Group/Organization	City of Douglas Finance Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Infrastructure & Public Facilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
3	Agency/Group/Organization	City of Douglas Leisure Services Dept.
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
4	Agency/Group/Organization	City of Douglas Public Library
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Public Facilities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
5	Agency/Group/Organization	Douglas ARC
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs

Table 2. Agencies, Groups, Organizations Who Participated

6	Agency/Group/Organization	House of Hope
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
7	Agency/Group/Organization	Sun Ray Family Apartments
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs
8	Agency/Group/Organization	Casas de Esperanza
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Meetings, email, correspondence; better understanding of needs

6. Identify any Agency Types not consulted and provide rationale for not consulting

To the best of its ability, the city is in contact with all known agencies and organizations involved in activities that are relevant to CDBG activities and programs. Our city departments work closely with the external agencies and all agencies are consulted as part of the environmental review process prior to beginning any activities.

Table 3. 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?
Continuum of Care	Arizona Department of Housing (ADOH), Special Needs Housing Office	Integrate efforts with State Plan through the Balance of State Continuum
Cochise County Comprehensive Plan	Cochise County Planning Department	Comprehensive Plan provides overall direction for County growth
Area Agency on Aging	SEAGO	SEAGO provides elderly & aging services through their Area Agency on Aging, to include transportation funding and senior nutrition services to all of southern Arizona.
Administrative Plan	Housing Authority of Cochise County	HACC provides housing assistance in all of Cochise County, including supportive housing for veterans (VASH) and persons with HIV/AIDS (HOPWA)
Domestic Violence Crisis Shelter	House of Hope	The House of Hope provides temporary, emergency housing to victims of domestic violence (men, women & children) in our City
Services for Disabled Individuals	Douglas ARC	Douglas ARC provides services and employment opportunities for disabled adult persons in the City of Douglas.

7. Narrative (optional)

During the completion of the Consolidated Plan many agencies were consulted and invited to participate in public meetings/hearings. These agencies are invited to participate annually. During the 2023 Annual Action Plan process the City held two (2) public hearings and received minimal participation. During the recent Consolidated Plan the City of Douglas held two (2) public hearings to which the general public and 48 individuals representing housing providers, government entities, educational, family service and youth organizations, religious groups, and the media were directly invited to attend these meetings. Bilingual staff (Spanish/English) are present at all public hearings to meet the needs of non-English speaking residents. Additionally, media outlets are invited to participate including Spanish speaking media outlets. In addition to notices to the general public, direct invitations were sent by email to the following entities:

Housing Providers – 10 individuals representing real estate, construction, affordable housing and housing assistance agencies, and other housing sector representatives:

1. Long Realty
2. Everett J. Jones Real Estate
3. Bosch Construction
4. GAR Construction
5. Douglas Realty Group
6. Douglas Realty Group
7. Abbott Realty Ltd

8. First West Properties Corporation
9. Abbott Realty Ltd
10. Douglas Realty Group

Government Entities – 11 individuals including City of Douglas and Cochise County departments:

1. Ann English – Cochise County Board of Supervisors
2. Max Tapia – City of Douglas /Facilities Maint. Dept.
3. Jennifer Smith – City of Douglas Leisure Services Dept.
4. Rene Rios – City of Douglas Procurement
5. Luis Pedroza – City of Douglas Finance Department
6. Cesar Soto – Douglas Unified School District Business Office
7. Jose Montaña – Customs and Border Protection
8. David Carranza – City of Douglas Economic Development Dept:
9. Margaret White – City of Douglas Library
10. Kevin Lomeli – City of Douglas Fire Dept.
11. Kraig Fullen – City of Douglas Police Dept.

Educational Organizations – Seven (7) individuals, including principals, representing the public schools and other education providers within and near the City of Douglas:

1. Douglas Unified School District
2. Douglas Unified School District
3. Douglas Unified School District
4. Center for Academic Success
5. Center for Academic Success
6. Loretto Catholic School
7. Douglas Unified School District

Family Service Organizations – Five (5) individuals including representatives of the Pinal Hispanic Council (a health services provider), Cochise Private Industry Council (CPIC) Center for Academic Success (CAS), Douglas Area Food Bank, Douglas ARC, and House of Hope (Catholic Community Services of Southern Arizona, Inc.)

1. Center for Academic Success
2. Douglas Association for Retarded Citizens
3. Douglas Area Food Bank
4. Pinal Hispanic Council
5. House of Hope

Youth Organizations – Three (3) individuals representing youth services providers, including:

1. American Youth Soccer Organization
2. Douglas Youth Football & Cheer
3. Douglas Little League

Religious Groups – Eight (8) individuals representing local churches and places of worship:

1. First Assembly of God
2. Sarah Montoya
3. Immaculate Conception Church
4. Danny “DJ” Morales
5. St. Luke’s Catholic Church
6. First Baptist Church
7. Deacon Luciano Gonzalez
8. Mark Adams – Frontera de Cristo

Media – Four (4) individuals representing local media outlets, including:

1. Douglas Dispatch
2. KDAP Radio
3. Univision
4. Inspiracom

Of those invited, several invitees attended the public hearings and provided representation for the American Youth Soccer Organization (AYSO), Cochise County Health and Social Services Department, and the Douglas Dispatch. Additionally, several members of the public attended these meetings.

According to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map accessed in 2023, the City of Douglas has 4 or more fixed residential broadband providers throughout the City. One impediment to broadband access within low- and moderate-income households is the ability to afford monthly fees along with purchasing of equipment (computers, smartphones, tablets, and routers).

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation.

Summarize citizen participation process and how it impacted goal-setting

The city considers the involvement of its low- and moderate-income residents and those agencies that serve the low- and moderate-income residents to be essential to the development and implementation of its Annual Action Plans.

Publicized public hearings were held on two occasions – on April 6, 2023, and May 10, 2023, for the proposed 2023 Annual Action Plan and proposed use of CDBG funds. These sessions were part of a concerted effort to obtain as much public input as possible in the preparation of the Plan. The draft plan was made available for public review and comment on the city website and made available in hard copy at the city offices between April 10, 2023, through May 10, 2023. The final public hearing was held on May 10, 2023, immediately preceding the Mayor & Council meeting at which the Annual Action Plan was submitted for approval.

The City of Douglas has identified Census Tracts 8 and 9 as low/mod Census Tracts, and historically, all infrastructure projects funded by CDBG have been targeted in these areas. These areas represent the Douglas Original Townsite and the majority of the homes in these areas were constructed prior to 1970.

The city ensures that all Public Hearings are held at times and locations convenient to potential and actual beneficiaries and with accommodations for persons with disabilities. Upon request, in advance of the meeting, the City attempts to make accommodations for those individuals in need of special assistance. The city also provides technical assistance workshops for all interested in the programs.

The Citizen Outreach Participation Table below provides details about the various outreach efforts.

Table 4. Citizen Participation Outreach						
Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/ broad community	Placed required notices in the City newspaper, on City's website and broad distribution by email invite. Published April 5, 2023	TBD	TBD	
2	Public Hearing	Non-targeted/ broad community	Staff present at the Public Hearing held on April 6, 2023, were [insert staff present]	Proposed Use of funds: Sewer replacement along 15 th Street between A and B Avenues.	TBD	
3	Public Review and Comment Period	Non-targeted/ broad community	The plan was made available for public review and comment from April 10, 2023 – May 10, 2023.	TBD	TBD	

Table 4. Citizen Participation Outreach						
Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/ broad community	The second public hearing to discuss the proposed 2023 Annual Action Plan held on May 10, 2023. Staff present at the public hearing included TBD. TBD of the public were in attendance.	TBD	TBD	

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

1. Introduction

The City of Douglas anticipates a total allocation of \$165,619 in Community Development Block Grant (CDBG) funding for the 2023/2024 program year. The city does not expect prior year resources. CDBG funds will be used for infrastructure improvements that benefit low- and moderate-income neighborhoods.

Table 5. Anticipated Resources								
Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	165,619	0	0	165,619	0	The City will look to leverage funds, if available, from other sources against CDBG dollars.

2. 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.

3. 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.

4. Discussion

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

Table 6. AP-20 Annual Goals and Objectives**Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facility and Infrastructure Improvements	2019	2023	Non-Housing Community Development	Citywide	Public Improvements/ Infrastructure	CDBG: \$132,496	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
3	Administration/Planning	2019	2023	Program Administration	Citywide	N/A	CDBG: \$33,123	Other

Table 7. Goal Descriptions

1	Goal Descriptions	Public Facility and Infrastructure Improvements
	Goal Descriptions	Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure. The proposed public facility improvements for FY2023 will take place at 15 th street from Avenues A to B and will replace a sewer. CDBG \$132,496
3	Goal Descriptions	Administration/Planning
	Goal Descriptions	Administration and planning of the CDBG program. Program administration addresses all outcomes, objectives and priority needs. CDBG \$33,123

AP-35 Projects – 91.220(d)

1. Introduction

The City of Douglas's planned actions for the 2023/2024 Annual Action Plan are intended to support community development for the City's low- and moderate-income populations.

The activities were prioritized as part of the Consolidated Plan process, in which public meetings were held, and public needs assessments were conducted. The proposed allocation of funds for FY2023 does not deviate from the goals outlined in the Consolidated Plan for 2019-2023.

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 2023/2024 program year, the City will fund improvements at Raul Castro Park to include shading, band shell improvements, and improvements to multi-purpose room within the park.

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 and infrastructure improvements.

Table 8. Project Information	
#	Project Name
1	Program Administration 2023
2	Infrastructure Improvements FY23

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

These priorities were established through the City's Citizen Participation Plan when identifying priorities for the Five-Year Strategic Plan. Public participation was solicited through meetings with individuals and organizations, as well as through email correspondence. Public Hearings were held on April 6, 2023, and May 10, 2023, to discuss the Annual Action Plan and receive public comment.

AP-38 Project Summary

Table 9. Project Summary Information

1	Project Name	Program Administration 2023
	Target Area	Citywide
	Goals Supported	Administration/Planning
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$33,123
	Description	Administration and planning of the CDBG program, to address all outcomes, objectives, and priority needs.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	21A General Program Administration - Overall program administration, including (but not limited to) salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring, and evaluation.
2	Project Name	Infrastructure Improvements FY23
	Target Area	Citywide
	Goals Supported	Public Facility and Infrastructure Improvements
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$132,496
	Description	The proposed public facility sewer improvements for FY2023 will take place at 15 th street between A and B Avenues.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	The proposed sewer improvements offer a low- and moderate-income clientele benefit to all residents, including 600 low- and moderate-income residents of Census Tract 902 Block Group 2. The activities will improve the condition of City infrastructure for residents.
	Location Description	15 th Street between A and B Avenues. Census Tract 902 Block Group 2.
	Planned Activities	03J Water/Sewer Improvements

AP-50 Geographic Distribution – 91.220(f)

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

For the 2023/2024 Annual Action Plan, City of Douglas will provide assistance to low- and moderate-income areas of the city in addition to improving the city as a whole. Assistance will be made available for improvements to sewers along 15th Street between A and B Avenues, which is located in Census Tract 902 Block Group 2. The subject block group has an LMI percentage of 75%.

The City estimates that 100% of its CDBG funds will be used to benefit low- and moderate-income persons citywide.

The total population in Tract 902 Block Group 2 is 795 according to the FY22 LMISD estimates. With a LMI percentage of 75%, the city estimates that 600 LMI persons citywide could benefit from this project.

Table 10. Geographic Distribution	
Target Area	Percentage of Funds
Citywide	100%

2. Rationale for the priorities for allocating investments geographically

The City'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. The proposed project site is located in Census Tract 902 Block Group 2 as shown on the Low- and Moderate-Income Areas by Block Group Map.

The city has worked closely with the public and civic leaders to ascertain the priority needs within the targeted areas.

3. Discussion

City of Douglas has identified infrastructure projects to implement the goals of the Strategic Plan during the FY2023 project year Annual Action Plan. The sewer improvements along 15th street between A and B Avenues will benefit low- and moderate-income persons primarily within Census Tract 902 Block Group 2. This Block Group has a LMI percentage of 75%

AP-55 Affordable Housing – 91.220(g)

1. Introduction

The City of Douglas does not plan to provide affordable housing support in the form of funding through the CDBG 2023 program year. The primary focus of FY2023 Annual Action Plan is to provide infrastructure improvements. The city will continue to work with non-profits and other housing partners to support affordable housing activities within the city, which in the future may include housing rehabilitation in support of affordable housing.

Table 11. One-Year Goals for Affordable Housing by Support Requirements	
One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 12. 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

2. Discussion

Not Applicable

AP-60 Public Housing – 91.220(h)

1. Introduction

The City of Douglas Housing Authority does not own any public housing units. The City of Douglas Housing Department transferred its Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County, effective January 1, 2023. Moving forward the City will provide referrals to the Housing Authority of Cochise County for those interested in the Section 8 Housing Choice Voucher program.

2. Actions planned during the next year to address the needs to public housing

Moving forward the City will provide referrals to the Housing Authority of Cochise County for those interested in the Section 8 Housing Choice Voucher program.

The City of Douglas Housing Authority does not currently have public housing units; however, as mentioned above the Housing Authority of Cochise County administers the Section 8 Housing Choice Voucher program with an allocation of 193 vouchers. The HA works with the Continuum of Care, other agencies and providers to fill gaps for emergency assistance, temporary relocation assistance, housing for veterans, and other special circumstances.

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

The City of Douglas Housing Authority does not own any public housing units. The City of Douglas Housing Department transferred its Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County, effective January 1, 2023. Moving forward the City will provide referrals to the Housing Authority of Cochise County for those interested in the Section 8 Housing Choice Voucher program.

The Housing Authority of Cochise County currently administers the Family Self-Sufficiency Program and provides case management for participants of the FSS program to provide referrals for services and resources, including homeownership counseling.

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

The Housing Authority of Cochise County is not designated as a troubled agency.

5. Discussion

Not Applicable

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

1. Introduction

The city is aware of and employs the services and programs of the state, the county, and several non-profit organizations to assist the homeless and assess their needs. Currently, homeless-related services fall on the responsibility of external organizations and agencies. The City of Douglas will continue to refer homeless persons to local and regional agencies who provide housing and supportive services to persons who are homeless.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The city participates in the State of Arizona Department of Housing's annual "Point of Time" Count for its Balance of State Continuum of Care (BOSCO). The City of Douglas Housing Authority refers people to local and regional agencies who provide resources to families in need.

Also, the city currently employs the services and programs of the State of Arizona, Cochise County, and several service nonprofit or not-for-profit service providers to assist the homeless and assess their needs. Among these services and programs are:

1. City of Douglas Housing – Provides Section 8 Housing Choice Voucher (rental assistance) and family self-sufficiency program
2. Cochise County Health Services – Offers variety of services that include education, clinical, addiction, environmental and other services
3. Douglas Area Food Bank – Offers food/nutrition days twice a week
4. St. Vincent DePaul – Offers various forms of living assistance such as utility bill assistance and rent assistance
5. House of Hope – Offers shelter to abused women and children
6. DARC – Provides various assistance programs for disabled such as jobs program
7. Douglas Work Force – Provides job training and employment opportunities

The City has also entered into an agreement with United Way of Sierra Vista and Cochise County, which will act as a subrecipient to disburse CDBG-CV funds to other local non-profit agencies that will carry-out the following activities: Rent/mortgage/utilities assistance, Covid-19 testing and/or vaccine expenses, food assistance, youth activities, and virtual learning and a community garden to address food insecurity in our area, which has been designated a “food desert.”

2. Addressing the emergency shelter and transitional housing needs of homeless persons

The City does not operate any emergency shelter or transitional housing programs but is aware of and cooperates with established County and regional programs and refers persons/families as necessary.

3. 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 Catholic Community Services of Southern Arizona operates a local shelter for men and 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. Several other not-for-profit agencies, local and regional, also offer housing assistance and other supportive services to persons who are homeless.

- 4. 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.**

A portion of the City of Douglas's FY16 CDBG entitlement funds was designated to assist low-income individuals and families in imminent danger of becoming homeless. The 2016 AAP designated funds for temporary emergency rental assistance for up to five households in danger of becoming homeless - a portion of the funds have been utilized and the City of Douglas is continuing to accept applications for the temporary assistance.

Through FY22 the City will continue to administer the 2020 CDBG-Coronavirus funds that provide funding to public service agencies that assist with mortgage and rental assistance, and COVID testing.

5. Discussion

Through FY23 the City will continue to administer the 2020 CDBG-Coronavirus funds that provide funding to public service agencies that assist with mortgage and rental assistance, food assistance, and COVID-19 testing to those LMI households that have been economically impacted by COVID-19.

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

1. Introduction

The largest and most important impediment 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.

2. 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

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 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 continue to provide rental assistance through its Public Housing Authority 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.

3. Discussion

Through FY23 the City will continue to administer the 2020 CDBG-Coronavirus funds that provide funding to public service agencies that assist with mortgage and rental assistance, food assistance, and COVID-19 testing to those LMI households that have been economically impacted by COVID-19.

AP-85 Other Actions – 91.220(k)

1. Introduction

The City will concentrate on completing its FY 2016 and FY 2018 activities which consist of temporary emergency rental assistance program for households in imminent danger of becoming homeless and public facility improvements to Veterans Park, while continuing to build collaboration opportunities with local social service agencies, towards meeting the goals established in the Consolidated Plan, through its Citizen Participation Process. By working together, the city can continue to reinforce those programs, which benefit low and very low-income residents.

2. 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.

3. Actions planned to foster and maintain affordable housing

The city will continue to operate its Section 8 Housing Choice Voucher program. We will continue to seek other funding sources, such as HOME, 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.

4. Actions planned to reduce lead-based paint hazards

The city will incorporate all HUD requirements concerning lead-based paint abatement into its housing rehabilitation programs, will see 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.

5. Actions planned to reduce the number of poverty-level families

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. 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.

6. 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. Also the city will seek opportunities to leverage the limited available resources.

7. 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 provide assistance to 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.

8. Discussion

The City's actions planned to address obstacles to meeting underserved needs include activities that provide an area benefit within low- and moderate-income areas. Additionally, the City's actions to foster and maintain affordable housing include continued implementation of activities funded with CDBG-CV funds that further the affordable housing goals of the City.

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

1. Introduction

Table 13. Community Development Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)	
Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.	
1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.0%

The 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 program year (2023/2024).

Appendix

- 1. Maps**
- 2. Public Participation**
- 3. SF-424 and SF-4242D**
- 4. Certifications**


Maps


CITY OF DOUGLAS, ARIZONA

2023-2024 Annual Action Plan


Low and Moderate Income Areas by Block Group

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


 Less than 51%


 51% and Greater

Note: The City of Douglas, AZ has an
Overall Low/Mod Percentage of 63.16%

 Sewer Improvements

Base Data

 City of Douglas

 Mexico and U.S. Border

 Highway Routes

 Roads

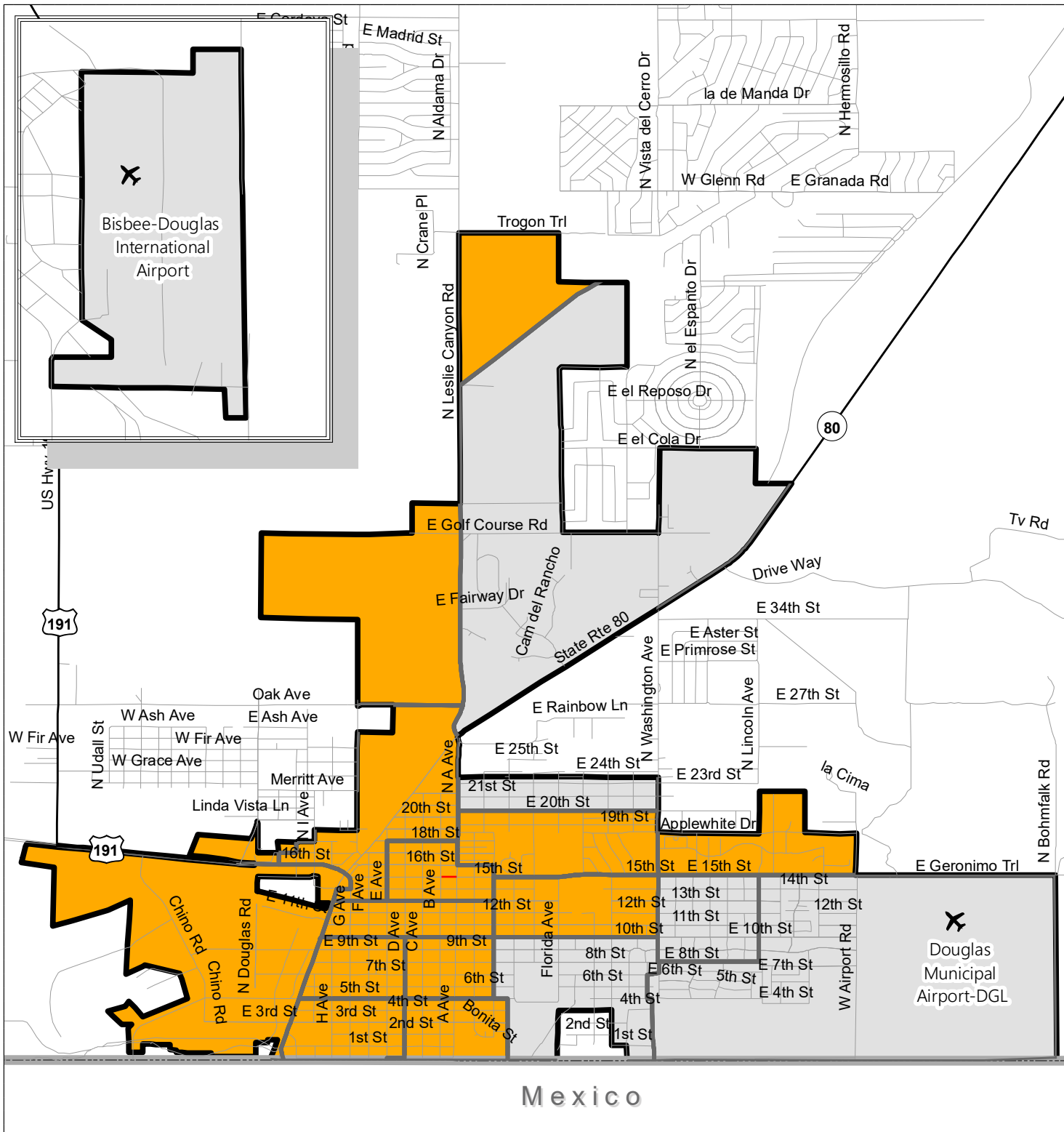
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Miles



April 2023



Sources: U.S. TIGER/Line Shapefiles; HIFLD Open Data
FY 2022 Low-and Moderate-Income Summary Data

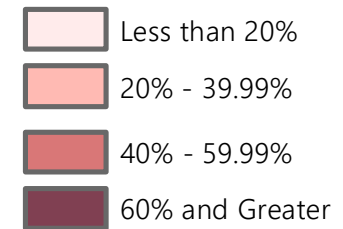


CITY OF DOUGLAS, ARIZONA

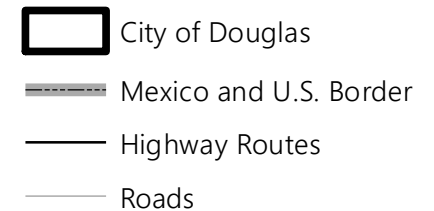
2023-2024 Annual Action Plan

Low Income Areas by Block Group

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



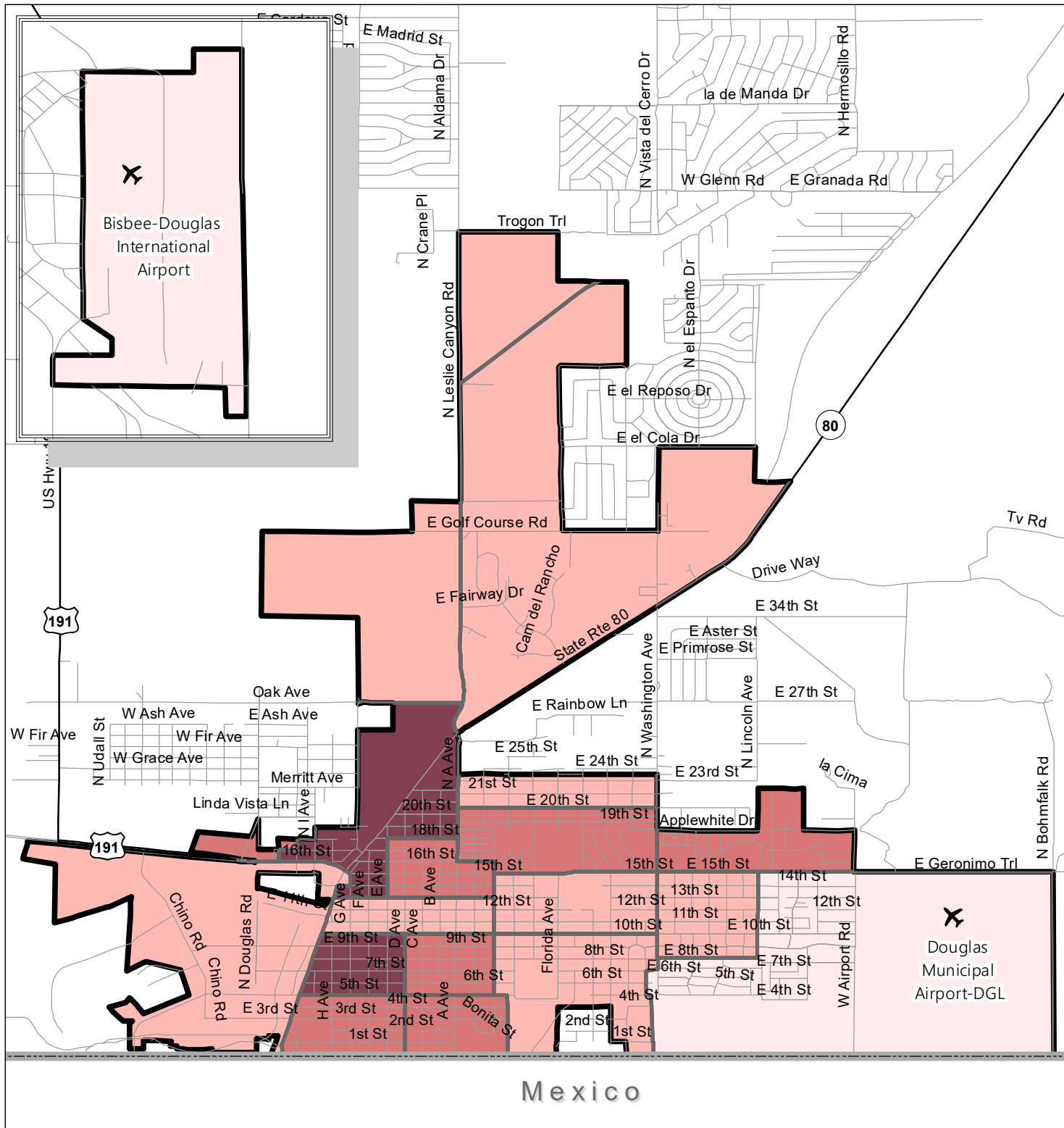
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April 2023



Sources: U.S. TIGER/Line Shapefiles; HIFLD Open Data
FY2022 Low-and Moderate-Income Summary Data

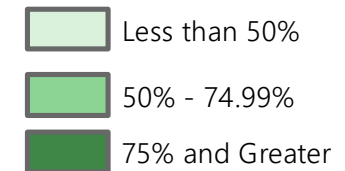


CITY OF DOUGLAS, ARIZONA

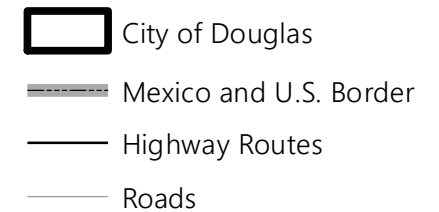
2023-2024 Annual Action Plan

Hispanic Population

Percent of Hispanic Population,
by Block Group



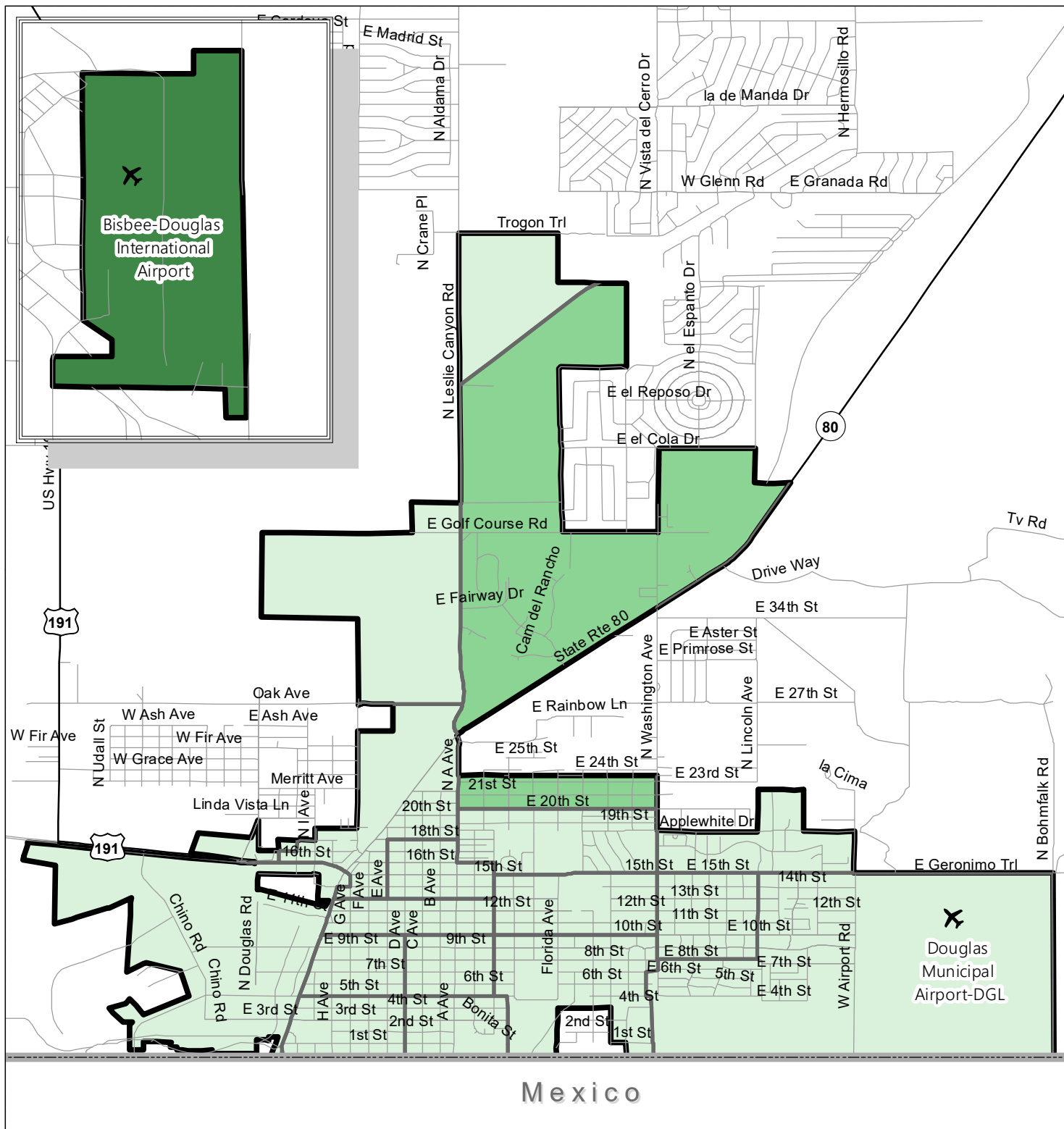
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April 2023



Sources: U.S. TIGER/Line Shapefiles; 2016-2020 American Community Survey 5-Year Estimates; HIFLD Open Data

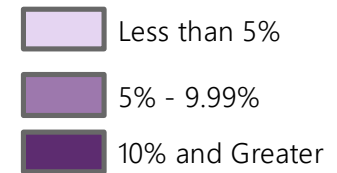


CITY OF DOUGLAS, ARIZONA

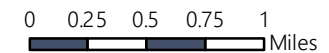
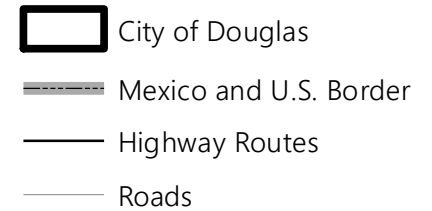
2023-2024 Annual Action Plan

African American Population

Percent of African American
Population, by Block Group



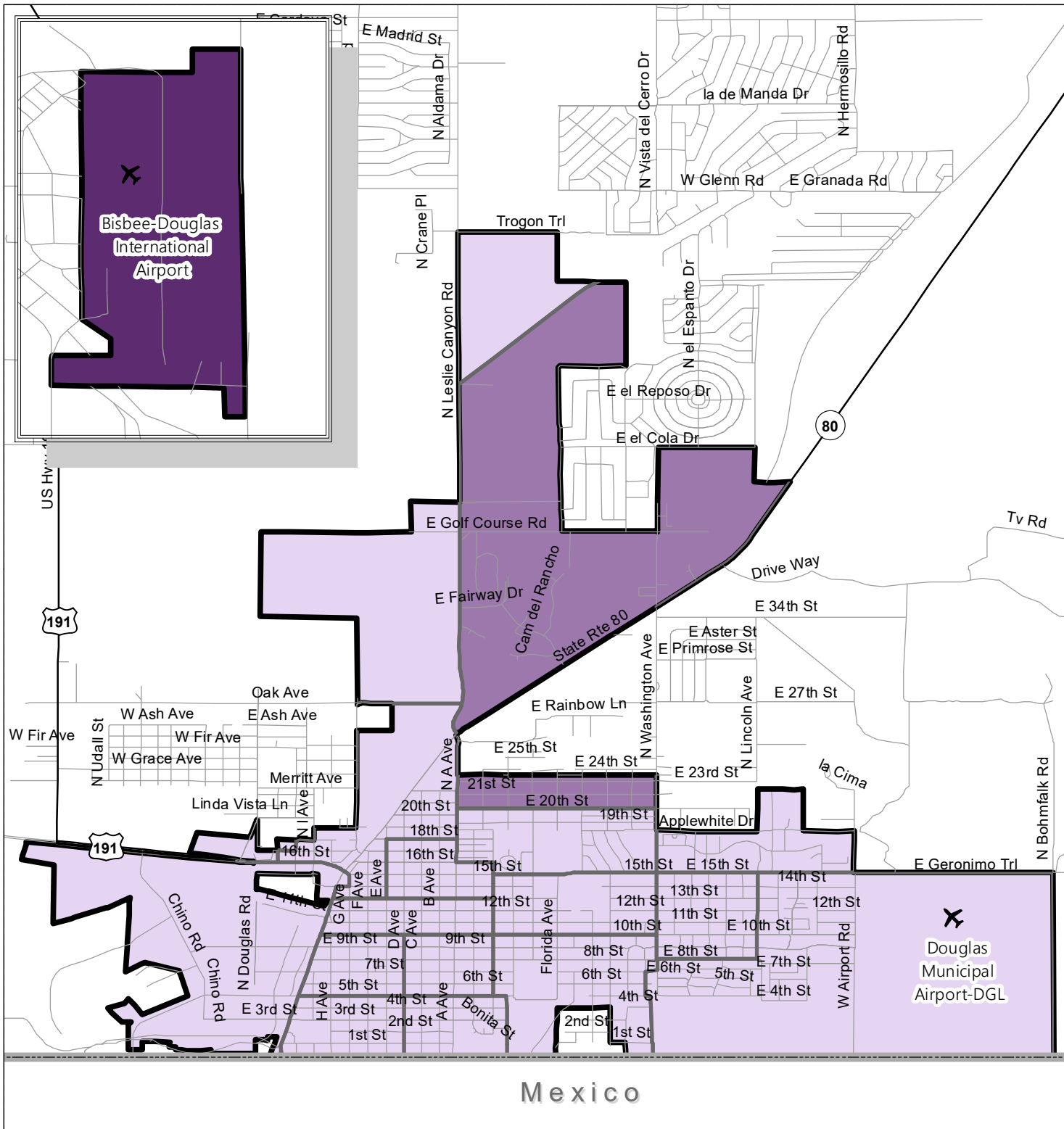
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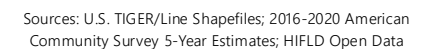


April 2023



Sources: U.S. TIGER/Line Shapefiles; 2016-2020 American Community Survey 5-Year Estimates; HIFLD Open Data



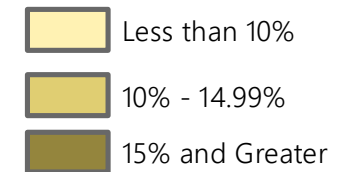


CITY OF DOUGLAS, ARIZONA

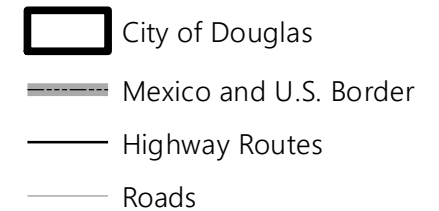
2023-2024 Annual Action Plan

Two or More Races Population

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



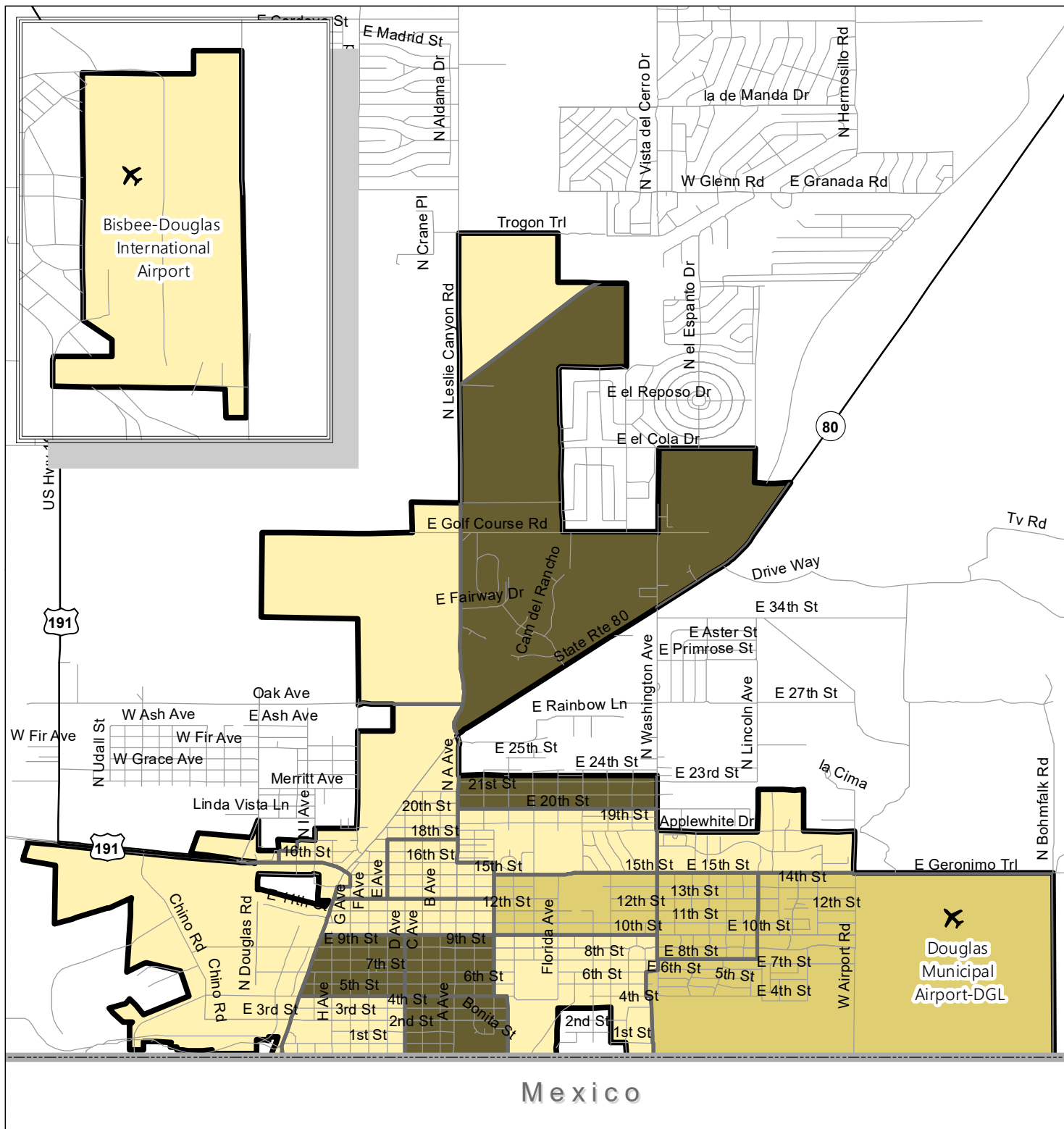
Base Data



April 2023



Sources: U.S. TIGER/Line Shapefiles; 2016-2020 American Community Survey 5-Year Estimates; HIFLD Open Data



Public Participation

City of Douglas
Annual Action Plan
Fiscal Year 2023

SUMMARY OF THE ANNUAL ACTION PLAN

The Annual Action Plan for Fiscal Year 2023 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 CDBG 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 locations of the completed document. Citizens have 30 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Neighborhood Resources and Grants Department, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 **on or before May 10, 2023.**

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 Annual Action Plan will be available for inspection and review at the Neighborhood Resources and Grants Department office at City Hall and on the City website, www.douglasaz.gov beginning on April 10, 2023 until May 10, 2023.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, **a public hearing will be held at 5:15 PM on April 6, 2023, at City Hall.** 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 final public hearing on the Annual Action Plan has been scheduled at or about 5:45 p.m. on May 10, 2023, 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 amount of the allocation for FY2023 is \$165,619.

The preliminary draft allocation for projects for FY 2023 is as follows: Infrastructure improvements to include sewer line installation and/or replacement along North Rogers Avenue.

The City will provide technical assistance to citizens and groups representative of persons of low and moderate income that request such assistance in the review of program activities and program amendments. In addition, the City will make adequate and reasonable provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case

basis, as well as provide auxiliary aides and services for individuals with disabilities. Requests for special accommodations must contact the Neighborhood Resources and Grants Department office at the contact information above.

Please publish on: April 5, 2023

SF-424 and SF-424D

Certifications