

FIVE-YEAR CONSOLIDATED PLAN 2024-2028



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



Executive Summary

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

1. Introduction

The City of Douglas, Arizona, has completed the planning process for the 2024 - 2028 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 \$171,181 in Community Development Block Grant (CDBG) funds. This amount totaled \$857,056 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.

Statutory Objectives

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

2. 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 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 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.

3. 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 that works to improve the quality of life for 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.

4. 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 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.

5. 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
- Sidewalk improvements
- Increased ADA accessibility for public facilities

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

Not Applicable.

7. Summary

The City of Douglas, Arizona, has completed the planning process for the 2024 - 2028 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 \$171,181 in Community Development Block Grant (CDBG) funds. This amount totaled \$857,056 over the previous five-years.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	DOUGLAS	Neighborhood Resources & Grants Department

Table 1 – Responsible Agencies

Narrative

The City of Douglas, Arizona is the lead agency responsible for overseeing the development of the Five-Year Consolidated Plan and Annual Action Plan. The Neighborhood Resources & Grants 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 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, Neighborhood Resources & Grants Director

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City of Douglas

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 – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

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.

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 2024 Consolidated 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. Bi-lingual 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 regard to internet/broadband within the City, according to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map accessed in 2024, 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).

Finally, the City of Douglas consults with the Arizona Department of Environmental Quality, Environmental Protection Agency, and Federal Emergency Management Agency annually through the environmental review process for CDBG funded activities. Through the Annual Action Plan process the Department of Public Works is consulted on all AAP processes as much of the City's construction projects are done in-house. Public Works, who maintains plans such as the City's Stormwater Management Plan, were consulted heavily on the 2024 public facilities project. Individuals involved include the Public Works Director, Elise Moore and Wastewater Supervisor, Miguel Arvizu.

In addition to notices to the general public, direct invitations were sent by email to the many entities outlined below and additional details are provided in the appendix of this report

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(I)).

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, 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).

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Douglas Department of Public works
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Economic Development Public facilities and infrastructure needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting and obtained ideas about needs and priorities
2	Agency/Group/Organization	City of Douglas Finance Department
	Agency/Group/Organization Type	Leveraging
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting and obtained ideas about needs and priorities
3	Agency/Group/Organization	City of Douglas Neighborhood Resources & Grants Dept
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting and obtained ideas about needs and priorities

4	Agency/Group/Organization	City of Douglas Public Library
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting and obtained ideas about needs and priorities
5	Agency/Group/Organization	City of Douglas Leisure Services Dept.
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis Recreational Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public meeting and obtained ideas about needs and priorities

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

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 2024 Consolidated Plan process the City held two public hearings and received minimal participation. 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:

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

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

1. Cochise County Board of Supervisors
2. City of Douglas /Facilities Maint. Dept
3. City of Douglas Leisure Services Dept
4. City of Douglas Procurement
5. City of Douglas Finance Department
6. Douglas Unified School District Business Office
7. Customs and Border Protection
8. City of Douglas Economic Development Dept
9. City of Douglas Library
10. City of Douglas Fire Dept
11. City of Douglas Police Dept

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

1. Douglas Unified School District
2. Center for Academic Success
3. Loretto Catholic School

Family Service Organizations – Five 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 individuals representing youth services providers, including:

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

Religious Groups – Eight 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. Frontera de Cristo

Media – Four individuals representing local media outlets, including:

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

Internet/Broadband Providers - Four individuals representing internet/broadband organizations, including:

1. Cox Communications
2. Century Link

Medical services providers - Two individuals representing a medical facility:

1. Chiricahua Community Health Centers, Inc.

Of those invited, several invitees attended the public hearings and provided representation for additional groups. Additionally, several members of the public attended these meetings.

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)	Coordinate efforts with state plan through the balance of state continuum

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 Fañade Improvement Grant Program	City of Douglas	Public Facility and Infrastructure Improvements; Economic Development
Housing Authority of Cochise County Administrative	Housing Authority of Cochise County	Coordinate efforts to improve affordable housing and fair housing for HCV recipients
City of Douglas General Plan 2024 (Draft)	City of Douglas	Public Facility and Infrastructure Improvements; Economic Development

Table 3 – Other local / regional / federal planning efforts

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(I))

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.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

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 low- and moderate-income 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 2024-2028 Consolidated Plan. A summary of the public participation process is shown in **Table 4**.

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.

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	Public Hearing	Non-targeted/broad community	May 28, 2024. Limited Attendance. All public hearing documentation is provided in the Appendix.	City staff presented highest priority needs: Infrastructure/public improvements; public facilities; provision of services and/or needs. Minutes for this meeting are attached.	All comments were accepted	
2	Public Hearing	Non-targeted/broad community	July 10, 2024. Limited Attendance. All public hearing documentation is provided in the Appendix.	No comments received	No comments received	
3	Newspaper Ad	Non-targeted/broad community	30-Day comment period. June 6 - July 8, 2024	No comments received	No comments received	

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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 Meeting	Non-targeted/broad community	July 10, 2024. Limited Attendance. All public meeting documentation is provided in the Appendix.	Plan Adopted by City Council	No comments received.	

Table 4 – Citizen Participation Outreach

Needs Assessment

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) 2016-2020 Data Book (data accessed April 2024), 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 2024 HUD Income Limits Documentation System which became effective on April 1, 2024. The HUD 2024 income limits for Cochise County are outlined in **Table 5**.

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.

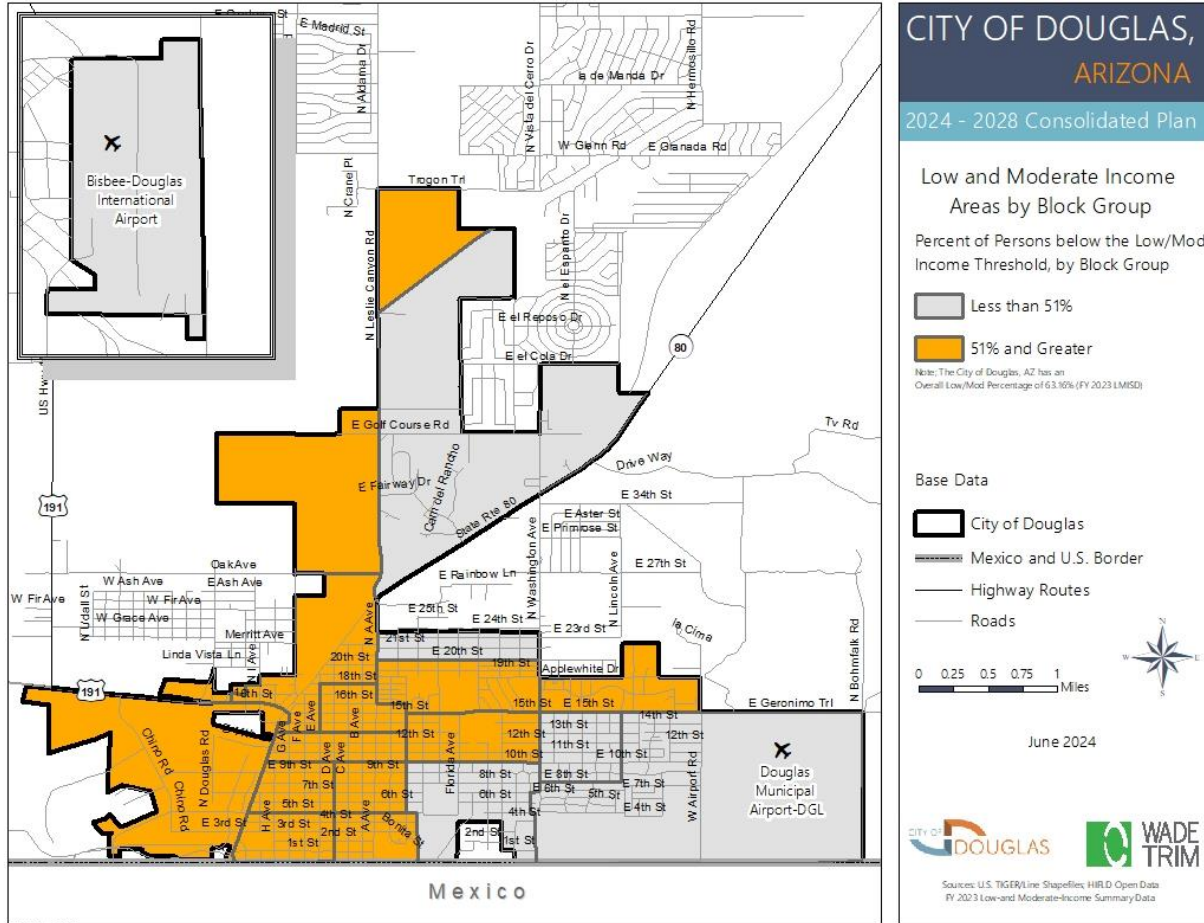
TABLE 5: 2024 HUD INCOME LIMITS

FY 2024 Income Limit Area	Median Income	FY 2024 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Cochise County	\$70,700	Extremely Low (30%) Income Limits	\$15,060	\$20,440	\$25,820	\$31,200	\$36,580	\$41,050	\$43,850	\$46,700
		Very Low (50%) Income Limits	\$24,750	\$28,300	\$31,850	\$35,350	\$38,200	\$41,050	\$43,850	\$46,700
		Low (80%) Income Limits	\$39,600	\$45,250	\$50,900	\$56,550	\$61,100	\$65,600	\$70,150	\$74,650

Effective April 1, 2024

Table 5 – 2024 HUD Income Limits

TABLE 5(A): 2024 HUD INCOME LIMITS



Map 1 CDBG Eligible Areas

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

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	Base Year: 2008	Most Recent Year: 2022	% Change
Population	17,339	16,301	-6%
Households	4,682	4,476	-4%
Median Income	\$28,548.00	\$41,594.00	46%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:

2018-2022 American Community Survey

Data Source Comments:

Demographics

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 2012 to 2022, nearly a 6% decrease as shown by the American Community Survey. In addition, the number of households decreased by 4.4%.

Table 6 also identifies an increase in the median income within the City of Douglas. The median income increased significantly: \$28,548 to \$41,594, representing a 45.7% increase.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	930	565	805	445	1,765
Small Family Households	375	170	280	195	820
Large Family Households	50	80	120	40	230
Household contains at least one person 62-74 years of age	160	155	290	115	370
Household contains at least one person age 75 or older	190	125	95	45	270
Households with one or more children 6 years old or younger	245	130	248	155	135

Table 6 - Total Households Table

Data Source: 2016-2020 CHAS

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 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

The largest number of households is in the greater than 100% HAMFI group with 1,765 households. The second largest group is the greater than 0-30% HAMFI group (930), followed by the 50-80% HAMFI group (805). This means that approximately 51% of all households in the City of Douglas are making less than 80% HAMFI. There are nearly 40% of households that are greater than 100% 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, and the second largest group is the 0-30% HAMFI group. The remaining income groups have a smaller number of small family households.

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

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. Households earning greater than 100% HAMFI contain the largest number of households 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 50-80% HAMFI.

Housing Needs Summary Tables

1. Housing Problems (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
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	10	0	0	0	10	0	10	0	0	10
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	20	0	20	20	35	4	0	59
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	30	15	4	4	53	10	10	10	15	45
Housing cost burden greater than 50% of income (and none of the above problems)	145	65	0	0	210	185	115	25	10	335

	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
Housing cost burden greater than 30% of income (and none of the above problems)	235	40	40	0	315	35	90	180	25	330
Zero/negative Income (and none of the above problems)	70	0	0	0	70	4	0	0	0	4

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

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 2016-2020 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 housing cost burden (greater than 30 percent of income) and severe 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 10 renter households who live in substandard housing and 10 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**, 73 renter households are experiencing some form of overcrowding, and 104 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 generally 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. There are 145 renters, and 185 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. The largest number of households experiencing housing cost burden greater than 30 percent of income for owners is within the 50-80% AMI group.

Overall, 545 households in the City of Douglas are experiencing a cost burden greater than 50% of income and 645 households experiencing a cost burden greater than 30% of income. There are a total of 1,190 households experiencing some type of cost burden, accounting for approximately 26% of all households within the city.

2. 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
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	185	80	25	4	294	215	170	40	25	450
Having none of four housing problems	400	85	205	185	875	130	235	535	230	1,130
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

Housing Problems 2

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 2016-2020 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 185 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 (215) with one or more of housing problems.

3. 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
NUMBER OF HOUSEHOLDS								
Small Related	145	45	0	190	65	75	45	185
Large Related	4	15	20	39	0	30	10	40
Elderly	135	30	20	185	100	130	130	360
Other	124	30	0	154	55	4	25	84

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	408	120	40	568	220	239	210	669

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

Cost Burden >30%

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 2016-2020 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 190 of the Small related renter 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 (360). 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 185 households. Among owners, the Small Related group has the second highest number of households that have a cost burden greater than 30% with 185 households.

For renter households, the 0-30% AMI Income group has the highest number of households with a cost burden greater than 30% of income, with 408 households. For owner households, the 30-50% AMI group has the number of households with a cost burden greater than 30% of income at 239 households

4. 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
NUMBER OF HOUSEHOLDS								
Small Related	0	0	35	35	65	40	0	105
Large Related	0	0	0	0	0	0	0	0
Elderly	35	10	0	45	65	90	0	155
Other	0	4	20	24	55	0	0	55
Total need by income	35	14	55	104	185	130	0	315

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

Cost Burden >50%

As shown in **Table 11**, the renter category most commonly experiencing severe cost burden greater than 50% of income are households in the Elderly group. Approximately 45 of the Elderly 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 (155). Additionally, for renters, the category defined as Small Related has the second highest number of households that have a cost burden greater than 50% with 35 renter households; the Small Related category has the second highest number of households experiencing a cost burden of greater than 50% among owners (105).

For renter households, the 50-80% AMI Income group has the highest number of households with a cost burden greater than 50% of income with a total of 104 households. For 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 185 households.

5. Crowding (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
NUMBER OF HOUSEHOLDS										
Single family households	25	15	24	4	68	10	20	10	15	55
Multiple, unrelated family households	4	0	0	0	4	20	30	0	0	50

	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
Other, non-family households	0	0	0	0	0	0	0	4	0	4
Total need by income	29	15	24	4	72	30	50	14	15	109

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

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 2016-2020 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 68 renter-occupied single-family owner households, and 55 owner-occupied single-family experience overcrowding in the City of Douglas.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source: No data
Comments:

Describe the number and type of single person households in need of housing assistance.

No data available

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

No data available

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 worse impact for owners 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, and elderly household types are more affected. Overcrowded housing is more common among owners; however, substandard housing affects renters and owners similarly. 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:

No data

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.

Discussion

N/A

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

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 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

0%-30% of Area Median Income

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
Jurisdiction as a whole	510	70	85
White	39	4	4
Black / African American	0	0	0
Asian	0	0	40
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	470	70	45

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*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%

0% to 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 (510 households) and the highest rate (76.69%). As shown in **Table 14**, when considering race and ethnicity, Hispanic households have the highest number of households with housing problems at 470 (80.34% of all Hispanic households earning 0-30% AMI) and White households have the second highest number with 39 households (82.98% 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.

30%-50% of Area Median Income

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
Jurisdiction as a whole	410	185	0
White	35	10	0
Black / African American	0	0	0
Asian	0	0	0

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
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	360	175	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*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%

30% to 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 (410 households), and the second highest rate (68.91%). As shown in **Table 15**, when considering race and ethnicity, Hispanic households have the highest number of households (360) with housing problems and White households have the second highest number (35). In terms of percentage, Hispanic households have the lowest rates (67.29% percent) of households experiencing housing problems when compared to all other ethnic groups. The remaining ethnic groups do not experience one or more of the four housing problems due to no population.

50%-80% of Area Median Income

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
Jurisdiction as a whole	280	425	0
White	10	34	0
Black / African American	0	0	0
Asian	10	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	260	380	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*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%

50% to 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 (280 households), and the third highest rate (39.72%). As shown in **Table 16**, when considering race and ethnicity, Hispanic households have the highest number of households (260) experiencing one or more of the four housing problems. Forty percent of Asian households are experiencing one or more of the four housing problems, while only 22.73% 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.

80%-100% of Area Median Income

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
Jurisdiction as a whole	29	370	0
White	0	50	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	29	305	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS

Source:

*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%

80% to 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 (29 households) and the lowest rate (7.27%). As shown in **Table 17**, when considering race and ethnicity, Hispanic households have the highest number of households (29) with housing problems. There is no population within this income group for the other racial categories.

Discussion

Of all households in the 0%-30% AMI category, 76.69% have one or more of four housing problems. In terms of disproportionate need, no racial or ethnic group is 10 percentage points or more above the jurisdiction as a whole.

Of all households in the 30%-50% AMI category, 68.91% have one or more of four housing problems. No racial or ethnic groups experience a disproportionate need.

Of all households in the 50%-80% AMI category, 39.72% have one or more of four housing problems. No racial or ethnic groups experience a disproportionate need.

Of all households in the 80%-100% AMI category, 7.27% have one or more of four housing problems. No racial or ethnic groups experience a disproportionate need.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

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 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data developed by HUD.

0%-30% of Area Median Income

Severe 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
Jurisdiction as a whole	380	205	85
White	34	8	4
Black / African American	0	0	0

Severe 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
Asian	0	0	40
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	340	195	45

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*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%

0% to 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 (380 households). As shown in **Table 18**, when considering race, Hispanic households have the highest number of households with severe housing problems at 340 and White households are second with 34 households.

30%-50% of Area Median Income

Severe 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
Jurisdiction as a whole	210	385	0
White	20	25	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	175	355	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*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%

30% to 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 (210 households). As shown in **Table 19**, when considering race, Hispanic households have the highest number of households with severe housing problems at 175 and White households are second with 20 households.

50%-80% of Area Median Income

Severe 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
Jurisdiction as a whole	120	590	0
White	4	39	0
Black / African American	0	0	0
Asian	0	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	115	525	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*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%

50% to 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 (120 households). As shown in **Table 20**, when considering race, Hispanic households have the highest number of households with severe housing problems at 115 and White households are second with 4 households.

80%-100% of Area Median Income

Severe 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
Jurisdiction as a whole	14	385	0
White	0	50	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	14	320	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*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%

80% to 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 (14 households). As shown in **Table 21**, when considering race, Hispanic Households are the only group affected by severe housing problems.

Discussion

Of all households in the 0%-30% AMI category, 56.72% have one or more severe housing problems. White households have a disproportionate need at 73.91% of households with one or more severe housing problems.

Of all households in the 30%-50% AMI category, 35.29% 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, 16.9% have one or more severe housing problems. No racial or ethnic groups have rates that are 10 percentage points higher than the household rate.

Demo

Of all households in the 80%-100% AMI category, 3.51% 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 – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

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 2016-2020 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 995 households. White households are second with 85 households.

Of the homes that are cost burdened, the majority (570) of these households are cost burdened (30-50%); however, there are 535 households that are severely cost burdened within the City of Douglas.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	2,225	570	535	95
White	270	30	55	4
Black / African American	10	0	0	0
Asian	19	10	0	40
American Indian, Alaska Native	4	4	0	0
Pacific Islander	0	0	0	0
Hispanic	1,905	520	475	50

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS
Source:

Discussion:

Within the City of Douglas, 64.96% of households do not presently experience cost burden, while 16.64% experience cost burden, 15.62% experience severe cost burden and 2.77% have no/negative income.

Of all households within the City of Douglas, 16.64% 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, 15.62% 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, 2.77% has no/negative income. The Asian racial or ethnic category (57.97%) has a no/negative income percentage that is disproportionate (greater than 10%) to all households.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

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, Asian, and White racial or ethnic groups.

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

- Housing cost burden in the 30-50% AMI category (50% versus 16.64% household average)

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

- No/negative income (57.97% versus 2.77% household average)

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

- Severe Housing problems in the 0-30% category (73.91% versus 56.72% household average)

If they have needs not identified above, what are those needs?

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 2018-2022 American Community Survey, the racial composition of the City of Douglas is 50.1% White, 3.6% Black/African American, 1.3% American Indian and Alaska Native, less than 1% Asian or Pacific Islander, 33.3 percent Two or More Races, and 10.9% some other race. It is also important to note that 84.6 percent of people in the City of Douglas identify themselves as Hispanic or Latino ethnicity. Of the City's 5 Census Tracts, none of them have a significant racial minority population; however, all tracts have a significant Hispanic or Latino ethnic population.

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

- Census Tract 6 – 74.9% Hispanic/Latino
- Census Tract 7 – 91.7% Hispanic/Latino
- Census Tract 8 – 90.2% Hispanic/Latino
- Census Tract 9.01 – 94.4% Hispanic/Latino
- Census Tract 9.02 – 92.8% Hispanic/Latino

Source: 2018-2022 ACS Data (2020 Census Boundaries)

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 70.5 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 high 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 – 91.205(b)

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. As of January 1, 2023, the City of Douglas Housing Department transferred its Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County. 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; however, this agency administers Housing Choice Vouchers for the City of Douglas.

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).

Demo

- **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

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	495	0	482	13	0	0

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Totals In Use

Table 23 displays the number of vouchers and units by public housing program type. There are 13 Veterans Affairs Supportive Housing in use, and 482 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 482 currently in use.

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	10,885	0	11,061	4,346	0
Average length of stay	0	0	0	3	0	3	0	0
Average Household size	0	0	0	2	0	2	1	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	125	0	125	0	0
# of Disabled Families	0	0	0	186	0	176	10	0
# of Families requesting accessibility features	0	0	0	495	0	482	13	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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 tenant based vouchers. The average income for tenant based is \$11,061 while the average income for veterans affairs supportive housing is \$4,346.

The number of disabled families getting assistance totals 186. No data is available for families that are requesting accessibility features. This data shows a high number of disabled families may need housing assistance/vouchers and housing accessibility.

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	417	0	406	11	0	0
Black/African American	0	0	0	58	0	57	1	0	0
Asian	0	0	0	8	0	8	0	0	0
American Indian/Alaska Native	0	0	0	10	0	9	1	0	0
Pacific Islander	0	0	0	2	0	2	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									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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 (417). There are 58 that identify as Black, eight Asian, ten American Indian/Alaska Native and two Pacific Islander race; however, no other races are represented in the public housing programs.

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	153	0	151	2	0	0
Not Hispanic	0	0	0	342	0	331	11	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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 less of the current vouchers in use. Most vouchers used are tenant based, with 495 residents using tenant-based programs of which 342 are “Not Hispanic”.

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Currently the PHA has 482 Tenant Based Vouchers in use and, based upon the figures above, 176 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.

Discussion

N/A

NA-40 Homeless Needs Assessment – 91.205(c)

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

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)	103	32	0	0	0	0
Persons in Households with Only Children	3	2	0	0	0	0
Persons in Households with Only Adults	828	142	0	0	0	0
Chronically Homeless Individuals	258	230	0	0	0	0
Chronically Homeless Families	4	2	0	0	0	0
Veterans	158	94	0	0	0	0
Unaccompanied Child	41	35	0	0	0	0

Demo

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 with HIV	13	3	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: 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.

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The most recent PIT was conducted on January 24, 2023. Respondents interviewed for the PIT were specifically asked about where they were physically staying and their personal status on the night of January 24, 2023.

The 2023 AZBoSCoC identified 1,886 persons experiencing homelessness in Balance of State Communities. The Arizona Department of Housing reports that there were 30 homeless households in Douglas alone during the 2023 point-in-time count.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	829	833
Black or African American	92	50
Asian	9	5
American Indian or Alaska Native	157	109
Pacific Islander	13	3
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	361	227
Not Hispanic	819	979

Data Source

Comments:

Source: January 24, 2023 Point-In-Time Counts for Arizona Balance of State Continuum of Care

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

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 were 30 total homeless households counted; however, it is unknown how many of these households include children or whether they are single-person households.

Veterans

In Douglas, there is no accurate way to measure the current percentage of homeless persons; however, the 2023 PIT count identifies 252 homeless veterans in the Balance of State communities at the time of the count. This is likely an overcount for the City of Douglas, but likely an overall undercount.

Unaccompanied Youth

There were 76 unaccompanied youth counted in the Balance of State communities. It is unknown how many of these youth may have been within Douglas.

Families in Need of Housing Assistance

All homeless persons and families are in need of housing assistance. In Douglas, there are a reported 30 homeless households. This is likely an undercount, and as such, transitional shelter, emergency shelter, and rapid re-housing services are likely needed. Additionally, these households will be in need of long-term affordable housing to prevent further homelessness.

Describe the 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. The following data is from the Balance of State point-in-time count from January 24, 2023.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The Arizona Balance of State counts included in the HUD 2023 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Report identifies 952 persons being unsheltered. It is unknown what percentage of this population resides within Douglas.

Discussion:

In Douglas, there is no accurate way to measure the current percentage of homeless persons. However, there are approximately 30 households in Douglas as reported in the 2023 PIT count.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

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.

Describe the characteristics of special needs populations in your community:

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:

HUD defines "elderly" as individuals over 62 and "frail elderly" as those over 75. Based on 2018-2022 ACS data, Douglas has 2,688 elderly individuals and 810 frail elderly. The frail elderly often require assistance due to age-related disabilities. With 25% of elderly households experiencing housing problems, approximately 672 elderly households in Douglas are affected.

Youth and Young Adults:

Douglas is home to about 3,670 children, with 22.5% of the population under 18. Of these, 45%, or 1,654 children, live in poverty.

Physically & Developmentally Disabled:

Approximately 1,645 people (12.5% of the population) in Douglas report a disability, categorized into hearing, vision, cognitive, ambulatory, self-care, and independent living difficulties. There are about 1,553 physically disabled individuals who may also have cognitive, self-care, or independent living impairments. Additionally, 1,488 individuals are developmentally disabled, often facing challenges in daily activities such as walking, dressing, and working.

Mental Illness & Substance Abuse:

HUD defines severe mental illness as a persistent impairment limiting independent living. In Douglas, 163 adults (1% of the adult population) are estimated to have severe mental illness. While specific data on substance abuse in Douglas is unavailable, national estimates suggest that 1,288 males and 289 females in the city may need support for alcohol addiction. Additionally, based on national data, approximately 1,199 Douglas residents over 16 likely struggled with substance dependence or abuse in 2012, though this may be an underestimate.

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

Douglas lacks reliable data collection methods for tracking victims of these forms of violence.

What are the housing and supportive service needs of these populations and how are these needs determined?

Please see the preceding responses.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

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.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

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 – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

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

How were these needs determined?

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.

Describe the jurisdiction's need for Public Improvements:

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 considering 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.

How were these needs determined?

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 and consultation with city departments.

Describe the jurisdiction's need for Public Services:

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

How were these needs determined?

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 and consultation with city departments.

Housing Market Analysis

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.

Additional Text

- *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.
- *Non-Housing Community Development Assets:* This section (MA-45) provides an inventory of the economic activities and opportunities within Sandusky. It identifies the topics of business by sector, labor force, occupations by sector, travel time, educational attainment, and earnings.
- *Broadband Needs of Housing:* This section (MA-60) describes the need for broadband connections for low- and moderate-income households and neighborhoods. It also identified whether additional competition is needed to encourage affordable rates.
- *Hazard Mitigation:* This section (MA-65) identifies the jurisdictions increased natural hazard risks and vulnerabilities as a result of climate change.

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

Introduction

The total number of housing units in City of Douglas has decreased slightly over the past decade. The City had a total of 5,560 housing units at the time of the 2008-2012 ACS and 5,469 housing units at the time of the 2018-2022 ACS.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	4,022	74%
1-unit, attached structure	358	7%
2-4 units	259	5%
5-19 units	548	10%
20 or more units	53	1%
Mobile Home, boat, RV, van, etc	229	4%
Total	5,469	100%

Table 27 – Residential Properties by Unit Number

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Additional Text

As shown in **Table 28**, data from the 2018-2022 ACS show that most residential properties are single units (a total of 4,380 or 80%). Single-unit properties are either detached structures (4,022 or 73.5%) or attached structures (358 or 6.5%). Residential properties are further categorized into properties within 2-4-unit structures (259 or 4.7%), properties within 5-19-unit structures (548 or 10%), and properties within 20 or more-unit structures (53 or approximately 0%). These categories comprise 94.7% of the City's housing stock. The remainder of residential properties in the City is classified as mobile home, boat, RV, van, etc. (229 or 4.2%).

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	21	1%	127	8%
1 bedroom	32	1%	278	17%
2 bedrooms	2,069	74%	1,170	70%
3 or more bedrooms	690	25%	89	5%
Total	2,812	101%	1,664	100%

Table 28 – Unit Size by Tenure

Alternate Data Source Name:
2018-2022 American Community Survey

Data Source Comments:

Additional Text

As shown in **Table 29**, there are an estimated 4,476 occupied housing units within the city. Of this total, 2,812 or 62.8% are owner-occupied and 1,300 or 37.2% are renter occupied.

Of all owner-occupied units, most contain 2 or more bedrooms (2,759 or approximately 98%), while a small percentage contain one bedroom (32 or around 1.1%). There are also a small number of owner-occupied units without bedrooms (21 or 0.7%).

Of all renter-occupied units, most contain 2 or more bedrooms (1,259 or 75.6%). In contrast to owner-occupied units, a modest percentage of renter-occupied units have 1 bedroom (278 or 16.7%). Only a small percentage of renter-occupied units are without bedrooms (127 or 7.6%).

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.

Describe the need for specific types of housing:

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

Discussion

The number of housing units in the city has slightly 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.

Cost of Housing

	Base Year: 2012	Most Recent Year: 2022	% Change
Median Home Value	95,300	125,600	32%
Median Contract Rent	430	714	66%

Table 29 – Cost of Housing

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Rent Paid	Number	%
Less than \$500	369	60.3%
\$500-999	843	36.5%
\$1,000-1,499	306	3.1%
\$1,500-1,999	14	0.0%
\$2,000 or more	0	0.0%
Total	1,532	99.9%

Table 30 - Rent Paid

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Additional Text

The costs of housing trends for City of Douglas are displayed in **Table 30**. According to the 2018-2022 ACS, the current median home value for City of Douglas is estimated to be \$125,600. This figure represents a nearly 32% increase from the 2008-2012 ACS median home value of \$95,300. Between the 2012 ACS and the 2022 ACS, the median contract rent within the City increased 66%, from \$430 to \$714.

The distribution of estimated rents paid within City of Douglas is detailed in **Table 31**, according to 2018-2022 ACS data. Of the approximately 1,500 rental units within the City, the majority (843 or 55%) have a rent between \$500 and \$999. A significant percentage of rental units have a rent less than \$500 (369 or 24.1%), while 306 or 19.9% have a rent between \$1,000 and \$1,499. A very small number of residents within the City who live in a rental unit has a rent that exceeds \$1,500.

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	280	No Data
50% HAMFI	655	520
80% HAMFI	1,015	1,160
100% HAMFI	No Data	1,473
Total	1,950	3,153

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

Additional Text

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 2016-2020 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 280 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 655 affordable rental units are available, while 520 affordable owner units are available. For households with incomes less than or equal to 80% HAMFI, a total of 1,015 affordable rental units are available, while 1,160 affordable owner units are available. Finally, for households with incomes less than or equal to 100% HAMFI, a total of 1,473 affordable owner units are available, while no data is provided for affordable rental units.

As noted previously in **Table 29**, an estimated 1,664 renter-occupied housing units are located within City of Douglas (including no rent paid). Of this total, only around 30% of renter-occupied housing units are affordable to the lowest income households (less or equal to 30% AMFI) and 86% are affordable to households earning less than or equal to 50% AMFI. Similarly, about 79% of renter-occupied housing units are affordable to households earning less than or equal to 80% AMFI.

An estimated 2,812 owner-occupied housing units are located within City of Douglas (see **Table 29**). Of this total, 100% are affordable to households earning less than or equal to 50% HAMFI, over 69% are

affordable to households earning less than or equal to 80% HAMFI, and about 30% are affordable to households earning less than or equal to 100% HAMFI.

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	770	913	1,067	1,504	1,811
High HOME Rent	727	775	964	1,121	1,231
Low HOME Rent	598	641	768	888	991

Table 32 – Monthly Rent

Data Source Comments:

Additional Text

Table 33 shows HUD FY2024 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 280 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. There appears to be sufficient housing for low-income households. A total of 565 households in the City earn more than 30% HAMFI but less than or equal to 50% HAMFI. According to the CHAS database, 655 rental-units and 520 owner-units are available and affordable to this income group. There also appears to be sufficient housing for moderate income households. A total of 805 households in the City earn more than 50% HAMFI but less than or equal to 80% HAMFI. There are approximately 1,950 affordable rental units and 3,153 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 31.8% from \$95,300 in 2012 to \$125,600 in 2022 according to the ACS for those years. Evidently, the long-term trend in housing value has been positive growth. Over this same period, the City's median contract rent increased by 66% from \$430 to \$714.

The City's median household income increased about 45% between the 2012 ACS and the 2022 ACS. 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 \$714 (according to the 2018-2022 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, the trend is the same. The current median contract rent for City of Douglas is higher than the low HOME rent for efficiency units and 1-bedroom units.

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.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,990	205%	5,929	370%
With two selected Conditions	180	6%	278	17%
With three selected Conditions	37	1%	22	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	28,675	984%	8,569	534%
Total	34,882	1196%	14,798	922%

Table 33 - Condition of Units

Alternate Data Source Name:

2018-2022 American Community Survey

Data Source Comments:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	450	15%	234	15%
1980-1999	325	11%	435	27%
1950-1979	1,395	48%	375	23%
Before 1950	745	26%	560	35%
Total	2,915	100%	1,604	100%

Table 34 – Year Unit Built

Data Source: 2016-2020 CHAS

TABLE 35: YEAR UNIT BUILT

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	376	13.3%	134	8.0%
1980-1999	370	13.2%	407	24.5%
1950-1979	1,329	47.3%	650	39.1%
Before 1950	737	26.2%	473	28.4%
Total	2,812	100%	1,664	100%

Data Source: 2018-2022 ACS

Table 35 – Year Unit Built

Table 35: Year Unit Built

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	2,140	73%	935	58%
Housing Units build before 1980 with children present	485	17%	210	13%

Table 35 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	723	270	993
Abandoned Vacant Units	0	0	0
REO Properties	8	0	8
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Alternate Data Source Name:

2018-2022 American Community Survey

Data Source Comments:

Need for Owner and Rental Rehabilitation

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Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

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 2018-2022 ACS and 2016-2020 CHAS.

As shown in **Table 36**, 2,066 or 73.5% of owner-occupied housing units in the city were built prior to 1980, while 485 or 17.2% were built before 1980 and have children present. For renter-occupied housing units, 1,123 or 67.5% were built prior to 1980, while 210 or 12.6% were built prior to 1980 and have children present.

Discussion

According to 2018-2022 ACS data, there are a total of 5,469 housing units within City of Douglas. Of these, 993 or approximately 18% are vacant (See **Table 37**). Based on the citywide percentage of all housing units built prior to 1980 (72.8%), approximately 723 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 April 2024, a total of eight properties are in some state of foreclosure (i.e., default, auction or bank owned).

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

Introduction

As was noted earlier in Section NA-35, the City of Douglas no longer carries the responsibility of the administration of housing programs for low-income persons. The city transferred its Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County, who are reliant upon annual appropriations provided by U.S. Department of Housing and Urban Development.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				518			93	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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:

The City does not have any public housing developments.

Public Housing Condition

Public Housing Development	Average Inspection Score
Not applicable	0

Table 38 - 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 transferred the administration of their Section 8 Housing Choice Voucher program to the Housing Authority of Cochise County, including 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 transfer of administration will benefit residents as the city no longer had the capacity to effectively administer this program.

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.

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)	217	0	118	800	0
Households with Only Adults	684	0	131	1,442	0
Chronically Homeless Households	531	0	0	0	0
Veterans	95	0	0	892	0
Unaccompanied Youth	3	0	11	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:
HUD Housing Inventory Count 2023
Data Source Comments:

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

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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 grantees: 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)

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.

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

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	70	75	2	3	1
Arts, Entertainment, Accommodations	321	321	7	13	6
Construction	286	60	6	3	-3
Education and Health Care Services	1,202	813	26	34	8
Finance, Insurance, and Real Estate	171	77	4	3	-1
Information	53	23	1	1	0
Manufacturing	339	0	7	0	-7
Other Services	372	37	8	2	-6
Professional, Scientific, Management Services	382	59	8	2	-6
Public Administration	636	264	14	11	-3
Retail Trade	481	499	11	21	10
Transportation and Warehousing	169	99	4	4	0
Wholesale Trade	90	57	2	2	0
Total	4,572	2,384	--	--	--

Table 40 - Business Activity

Alternate Data Source Name:

2018-2022 American Community Survey

Data Source Comments: Data Source: 2018-2022 ACS (Workers), 2021 Longitudinal Employer-Household Dynamics (Jobs) Universe: Civilian Employed Population 16 years and over

Additional Text

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 2018-2022 ACS, there are 4,572 workers within all business sectors identified in City of Douglas. The number of jobs within all sectors is estimated to be 2,384

according to 2021 Longitudinal Employer-Household Dynamics data published by the U.S. Census Bureau.

The largest percentages of workers are within the Education and Healthcare Services (26%) and Public Administration (14%). Workers in the Retail Trade sector comprise 11%. Workers in the Wholesale Trade (2%), Agriculture (2%) and Information (1%) sectors comprise the smallest percentage of workers.

The largest share of jobs is within the Education and Health Care Services sector (34%), and Retail Trade sector (21%). Jobs in Public Administration (11%), and the Arts, Entertainment, and Accommodations (13%) sectors are also well-represented. The following sectors account for the smallest share of jobs available: Manufacturing (less than 1%); Wholesale Trade (2%); Professional, Scientific, and Management (2%); Information (1%); and Other Services except Public Administration (2%).

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 six business sectors: Finance, Insurance, and Real Estate; Professional, Scientific, and Management; Manufacturing; Public Administration; Construction; and Other Services, except Public Administration. 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 four business sectors: Agriculture, forestry, and fishing; Education and Health Care Services; Retail Trade; 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.

Labor Force

Total Population in the Civilian Labor Force	5,193
Civilian Employed Population 16 years and over	4,572
Unemployment Rate	4.80
Unemployment Rate for Ages 16-24	27.20
Unemployment Rate for Ages 25-65	9.30

Table 41 - Labor Force

Alternate Data Source Name:
2018-2022 American Community Survey

Data Source Comments:

Additional Text

Table 42 portrays the labor force within City of Douglas. According to the 2018-2022 ACS the total population within the City in the civilian labor force is 5,193. 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 4,572. According to 2018-2022 ACS estimates, the City's unemployment rate is approximately 4.8%. The average unemployment rate for those between the ages of 16-24 is 27.2% while for ages 25-65 the average unemployment rate is approximately 9.3%.

Occupations by Sector	Number of People
Management, business and financial	1,187
Farming, fisheries and forestry occupations	0
Service	1,355
Sales and office	1,067
Construction, extraction, maintenance and repair	444
Production, transportation and material moving	519

Table 42 – Occupations by Sector

Alternate Data Source Name:
2018-2022 American Community Survey

Data Source Comments:

Additional Text

Table 43 identifies Occupations by Sector within City of Douglas according to the 2018-2022 ACS. Service occupations account for the largest number of occupations. Sales and Office, and Management, business and financial occupations are also well-represented. The least represented occupations in City of Douglas are Natural resources, construction; and maintenance, and Production, transportation, and material moving. Of these occupations, median earnings are highest in the Management, business and financial occupations, whereas median earnings are lowest in the Sales and Office.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	3,184	80%
30-59 Minutes	340	9%
60 or More Minutes	438	11%
Total	3,962	100%

Table 43 - Travel Time

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Additional Text

As shown in **Table 44**, most City of Douglas residents commute less than 30 minutes to work (80.3%). A notable percentage travel 30-59 minutes (8.6%) with a small percentage commuting more than one hour (11.1%).

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	503	137	1,240
High school graduate (includes equivalency)	1,012	145	1,777
Some college or Associate's degree	1,488	77	1,315
Bachelor's degree or higher	680	0	151

Table 44 - Educational Attainment by Employment Status

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Additional Text

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 and high school graduates. A significant number of employed also have a bachelor's degree or higher.

Among the highest numbers of unemployed are also those persons who did not graduate high school and those with some college or an associate degree. When looking at the civilian labor force ages 25-65 years, 3,683 are employed, 359 are unemployed, and 4,483 are not in the labor force and are not actively seeking employment.

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	41	94	140	534	532
9th to 12th grade, no diploma	383	399	264	449	244
High school graduate, GED, or alternative	625	1,053	732	1,149	528
Some college, no degree	729	769	630	671	440
Associate's degree	138	262	212	336	98
Bachelor's degree	8	294	113	184	144
Graduate or professional degree	0	59	66	115	196

Table 45 - Educational Attainment by Age

Alternate Data Source Name:
2018-2022 American Community Survey
Data Source Comments:

Additional Text

Table 46 shows Educational Attainment by Age. A significant population over the age of 18 (3,080 or 24.3%) in City of Douglas did not graduate from high school. More than half of adults (7,329 or 58%) graduated from high school or have some college education but no college degree. Combined, nearly over 82% of the population 18 years or older (10,406 adults) do not have a college degree.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,750
High school graduate (includes equivalency)	24,229
Some college or Associate's degree	29,027
Bachelor's degree	45,194

Educational Attainment	Median Earnings in the Past 12 Months
Graduate or professional degree	53,594

Table 46 – Median Earnings in the Past 12 Months

Alternate Data Source Name:

2018-2022 American Community Survey

Data Source Comments:

Additional Text

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 2018-2022 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 \$53,594 and persons having a bachelor's degree have a median income of \$45,194. In contrast, persons with some college or an associate degree have a median income of \$29,027. Similarly, those having a high school diploma or equivalency have a median income of \$24,229 and those without a high school diploma or equivalency have a median income of \$18,750.

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 59% 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.

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 2011 and developed a Streetscape Master Plan in 2023. These plans guide 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?

The largest percentages of workers are within the Education and Healthcare Services (26%) and Public Administration (14%). Workers in the Retail Trade sector comprise 11%. Workers in the Wholesale Trade (2%), Agriculture (2%) and Information (1%) sectors comprise the smallest percentage of workers.

The largest share of jobs is within the Education and Health Care Services sector (34%), and Retail Trade sector (21%). Jobs in Public Administration (11%), and the Arts, Entertainment, and Accommodations (13%) sectors are also well-represented. The following sectors account for the smallest share of jobs available: Manufacturing (less than 1%); Wholesale Trade (2%); Professional, Scientific, and Management (2%); Information (1%); and Other Services except Public Administration (2%).

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 six business sectors: Finance, Insurance, and Real Estate; Professional, Scientific, and Management; Manufacturing; Public Administration; Construction; and Other Services, except Public Administration. 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 four business sectors: Agriculture, forestry, and fishing; Education and Health Care Services; Retail Trade; 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.

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)?

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.

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Discussion

According to the 2018-2022 ACS, the City of Douglas labor force is comprised of approximately 5,193 people, of which approximately 4.8% 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 Sales and Office. About 75.6% of City of Douglas's adult population has at least a high school diploma or equivalent, but only 9.3% 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.

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

Source: HUD CPD Maps, Accessed April 2024

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; however, no part of the city has a concentration of households with housing problems in the 50-75% or greater than 75% range. Geographically, housing problems affecting extremely low-income households are likely the most widespread.

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. The entire city has a minority Hispanic or Latino ethnicity of greater than 75%. 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.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

According to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map, accessed in April 2024, nearly all of Douglas has six or more fixed residential broadband providers throughout the city, and three mobile broadband providers. 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).

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

As stated above, according to the Federal Communications Commission (FCC) Fixed Broadband Deployment Map accessed in April 2024, Douglas has six or more fixed residential broadband providers throughout the city; therefore, there is already competition in the area.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

According to most scientists, the impacts of climate change in Douglas will include more summer heat waves and hot days. Water availability and quality has declined over the past several decades, and it is anticipated that with warmer weather will come intensified droughts. As groundwater sources become depleted in the heat, it can be expected that there will be an increase in heat-related illness and death, reduced air quality, and reduced water quality. Droughts, and occasional flooding will contribute to water demands, and combined with a growing population, it is expected that infrastructure will deteriorate related to increased demands during wet weather and heat events (sewer overflows, electric grid reliability issues, and buckling of roadways).

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Strategic Plan

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 are 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 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 – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	Low/Mod Neighborhoods
	Area Type:	Infrastructure, housing and services for low/mod residents
	Other Target Area Description:	Infrastructure, housing and services for low/mod residents
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	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.
	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.

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

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.

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.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Provide Affordable Housing Opportunities
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Provide Affordable Housing Opportunities, including Rental Assistance, Homeowner Rehabilitation
	Basis for Relative Priority	Public input
2	Priority Need Name	Fair Housing
	Priority Level	Low
	Population	Extremely Low Low Moderate Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Fair Housing
	Basis for Relative Priority	Public input
3	Priority Need Name	Rental Acquisition and Rehabilitation
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Rental Acquisition and Rehabilitation; New Rental Construction
	Basis for Relative Priority	Public input
4	Priority Need Name	Homeless Activities
	Priority Level	Low
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Homeless Activities, including Homeless Prevention, Emergency Shelters, and Transitional Housing
	Basis for Relative Priority	Public input
5	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate

	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Economic Development, including job training
	Basis for Relative Priority	Public input
6	Priority Need Name	Public Improvements/Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	Public Facility and Infrastructure Improvements
	Description	Public Improvements/Infrastructure
	Basis for Relative Priority	Public input
7	Priority Need Name	Public Facilities
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	Public Facility and Infrastructure Improvements
	Description	Public Facilities

	Basis for Relative Priority	Public input
8	Priority Need Name	Public Service Programs
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly
	Geographic Areas Affected	
	Associated Goals	Provision of Needed Services
	Description	Public Service Programs, especially for the Elderly, and for Healthcare
	Basis for Relative Priority	Public input

Narrative (Optional)

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**).

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 – 91.215 (b)

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.
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 49 – Influence of Market Conditions

Demographics

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 2012 to 2022, nearly a 6% decrease as shown by the American Community Survey. In addition, the number of households decreased by 4.4%.

Table 6 also identifies an increase in the median income within the City of Douglas. The median income increased significantly: \$28,548 to \$41,594, representing a 45.7% increase.

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

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	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	171,181	0	0	171,181	680,000	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 50 - 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 uses general fund resources for infrastructure and community service activities on a regular basis, but such funds are becoming increasingly limited considering 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 publically 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.

Discussion

No further discussion.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City Council	Government	Planning	Jurisdiction
Housing Authority of Cochise County	PHA	Public Housing	Region
City of Douglas Neighborhood Resources & Grants Dept	Government	Ownership Planning Rental	Jurisdiction
City of Douglas Department of Public works	Government	Planning neighborhood improvements public facilities	Jurisdiction
Catholic Community Services of Southern Arizona, Inc	Non-profit organizations	Homelessness	Region
City of Douglas Leisure Services Dept.	Government	neighborhood improvements public facilities	Jurisdiction
Arizona Balance of State Continuum of Care (CoC)	Continuum of care	Homelessness Non-homeless special needs	State
COCHISE COUNTY	Government	Economic Development Homelessness Non-homeless special needs Public Housing	Region

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

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 Neighborhood Resources and Grants (NRG) 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 NRG 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 NRG Department will make a conscious effort to avoid duplication of services and delivery systems; it 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.

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 NRG 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.

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

Street Outreach Services			
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, and Youth Programs	X	X	X

Table 52 - 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 municipal service delivery system 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 for carrying out a strategy 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 – 91.215(a)(4)

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	2024	2028	Non-Housing Community Development		Public Improvements/Infrastructure Public Facilities	CDBG: \$580,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted
2	Provision of Needed Services	2024	2028	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Provide Affordable Housing Opportunities Fair Housing Rental Acquisition and Rehabilitation Homeless Activities Economic Development Public Service Programs	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
3	Administration/Planning	2024	2028	Program Administration			CDBG: \$170,000	Other: 0 Other

Table 53 – Goals Summary

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.
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.
3	Goal Name	Administration/Planning
	Goal Description	CDBG Administration

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 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 – 91.215(c)

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 Involvements

The City of Douglas no longer administers the HCV program; these efforts and responsibilities have been transferred to the Housing Authority of Cochise County.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the ‘troubled’ designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

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.

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.

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 does not plan to support rental assistance or rehabilitation efforts at this time due to limited funding. In the future, the city may seek to develop affordable housing projects. The efforts will be limited because of the amount of funds available and the many competing needs.

SP-60 Homelessness Strategy – 91.215(d)

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 previously, 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 need.

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.

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. 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 – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

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, 73.4% of owner-occupied housing units were built prior to 1980. For renter-occupied units, 67.4% were built prior to 1980. Based on the overall low/mod percentage for the city of 63.63%, 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 NRG Department and the homeowner by the inspector(s).

SP-70 Anti-Poverty Strategy – 91.215(j)

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, the City will attempt to fund programs that provide job training, education and other employment related services, and childcare services for working families as funding is available. 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 – 91.230

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 relatively new entitlement community, the City of Douglas is continually 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 NRG 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.

Expected Resources

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

Introduction

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	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	171,181	0	0	171,181	680,000	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 54 - Expected Resources – Priority Table

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 uses general fund resources for infrastructure and community service activities on a regular basis, but such funds are becoming increasingly limited considering 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 publically 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.

Discussion

No further discussion.

Annual Goals and Objectives

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	2024	2028	Non-Housing Community Development		Public Improvements/Infrastructure Public Facilities	CDBG: \$136,945	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted
2	Administration/Planning	2024	2028	Program Administration			CDBG: \$34,236	Other: 0 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facility and Infrastructure Improvements
	Goal Description	

2	Goal Name	Administration/Planning
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

City of Douglas's planned actions for the 2024 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 NRG Department which will continue to provide support for public facilities infrastructure improvements and, when possible, Fair Housing and social services information, 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. 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 2024 Annual Action Plan are summarized in **Table 59**.

Projects

#	Project Name

Table 56 – 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	\$34,236	20%
Public Facility/Infrastructure Improvements	\$136,945	80%

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 2024 CDBG allocation to public service activities.

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Est num of f wil the act
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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 2024 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**)

Geographic Distribution

Target Area	Percentage of Funds
Low/Mod Neighborhoods	100

Table 57 - 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 2024-2028 Consolidated Plan. These projects benefit low- and moderate-income persons citywide.

Affordable Housing

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.]

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

Table 58 - One Year Goals for Affordable Housing by Support Requirement

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 59 - 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 2024-2028 Consolidated Plan. The primary focus of the 2024 Annual Action Plan is to provide public facilities/infrastructure improvements. Affordable housing support during the remaining years (i.e., next four years) of the 2024-2028 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 2024 program year to carry out the public housing portion of the Strategic Plan. Below, the city has identified the way the 2024 Annual Action Plan will address the needs of public housing during the program year.

The Housing Authority of Cochise County works collaboratively with the City to assist low- and moderate-income households. The Authority 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 Housing Authority of Cochise County 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 Housing Authority of Cochise County.

Additionally, the PHA will assist 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 Housing Authority of Cochise County is not a troubled agency.

Discussion

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

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

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.

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.

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 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 2018-2022 American Community Survey (ACS) estimates, 29.1% 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 NRG 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 NRG 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.

Program Specific Requirements

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

Introduction:

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

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 2024 program year.

Community Development Block 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
<TYPE=[text] REPORT_GUID=[A698417B4C924AE0218B42865313DACF] DELETE_TABLE_IF_EMPTY=[YES]>	
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.	100.00%

1. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)). <TYPE=[text]
REPORT_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>

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 (2024).

Attachments

Citizen Participation Comments

3. Public Participation Summaries



Embracing our Heritage, Advancing our Future

CERTIFICATION

I, Alma Andrade, certify that I am the duly appointed and City Clerk of the City of Douglas, Arizona, and I further certify that the foregoing is a true and correct copy of the original Resolution No. 24-1611 passed at a Regular Meeting of the Douglas Mayor and Council held on the 10th day of July 2024, and further certify that said meeting was held pursuant to law and was in all aspects a true and lawful meeting and that all proceedings thereunder were held in accordance with the applicable law.

Dated this 11th day of July 2024.



A handwritten signature in blue ink, appearing to read 'Alma Andrade'.

Alma Andrade, City Clerk

RESOLUTION NO. 24-1633

A RESOLUTION OF THE MAYOR AND COUNCIL OF THE
CITY OF DOUGLAS, COCHISE COUNTY, ARIZONA,
APPROVING THE COMMUNITY DEVELOPMENT BLOCK
GRANT (CDBG) 5-YEAR CONSOLIDATED PLAN 2024-2028
AND ANNUAL ACTION PLAN FY 2024 FOR THE CITY OF
DOUGLAS.

WHEREAS, the City of Douglas receives Community Development Block Grant (CDBG) funds from
the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, HUD requires that participating jurisdictions prepare a Five-Year Strategic Plan
(Consolidated Plan) and an Annual Action Plan for each year of the five-year cycle for the use of these
funds;

NOW, THEREFORE, BE IT RESOLVED by the Mayor and Council of the City of Douglas, Arizona,
as follows:

SECTION 1. The Consolidated Plan for the years 2024-2028 is hereby approved.

SECTION 2. The Annual Action Plan for the Fiscal Year 2024 is hereby approved.

SECTION 3. A copy of each of the said documents is attached hereto and incorporated herein by
reference as fully as if set forth verbatim.


SECTION 4. All resolutions or parts of resolutions, in conflict herewith are repealed.

PASSED AND ADOPTED by the Mayor and Council of the City of Douglas, Arizona, this 16th day of
July 2024.


Donald C. Hujsh, Mayor

Approved as to form:

Attest:


Alina Andrade, City Clerk


Denis Fitzgibbons, City Attorney

Prepared by:
Xenia Gonzalez, Neighborhood Resources & Grants Director

[illegible]

CDBG PUBLIC HEARING

May 28, 2024

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

A public hearing was held on May 28, 2024 at 4:00 p.m. in the City Hall Council Chambers, in order to present the FY 2024 Annual Action Plan and Consolidated Plan 2024-2028 for CDBG Entitlement funds.

There was one (1) member from the public present.

City staff members present were: City Manager, Ana Urquijo; Deputy City Manager, Luis Pedroza; Public Works Director, Elise Moore; IT Manager, Joel Camacho, Economic Development/CMO Project Coordinator, Damian Dorame and Neighborhood Resources & Grants Director, Xenia Gonzalez who facilitated the hearing.

Neighborhood Resources & Grants Director, Xenia Gonzalez, presented the proposed use of entitlement funds for the fiscal year (FY2024) and proposed CDBG project activities for the Consolidated Plan 2024-2028 5-year cycle 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 2024 is \$171,181. The funding for FY 2024 has been designated as follows: Infrastructure improvements installation of curb, sidewalk and lighting on 15th Street from Washington Avenue to Airport Road located in Census Tract 7 in Douglas, Arizona.

A question asked by the member of the public was what area(s) of Douglas will these activities take place in? Staff showed him the map of the LMI areas within the City of Douglas, where activities can be funded with CDBG entitlement funds. A follow-up question was if there are any CDBG activities planned for F Avenue in Douglas. Response from staff was that there are no specific activities planned in that area at this time; however, you can send an email with your issue/concern/request and staff will determine how best to address it (CDBG, capital improvements plan, other funding source, etc)

Staff asked Ms. Gonzalez to explain the Annual Action Plan process for the benefit of those in attendance. Another question asked by staff was whether changes can occur to activities outlined in the 5-year Consolidated Plan as the City's needs change. Ms. Gonzalez responded that the City can undergo an amendment process to their consolidated plan (minor or substantial, depending on Citizen Participation Plan) to shift focus during the 5-year cycle.

There were no negative comments received on the proposed uses of CDBG funds.

The public hearing was adjourned at 4:18 p.m.

4:50 pm D

City Staff:

CDBG PUBLIC HEARING

July 10, 2024

4:50 P.M. – CITY HALL COUNCIL CHAMBERS

A public hearing was held on July 10, 2024 at 4:50 p.m. in the City Hall Council Chambers, to receive public comments on the Consolidated Plan 2024-2028 and FY 2024 Annual Action Plan for CDBG Entitlement funds.

There were no members from the public present for the public hearing.

City staff members present were: Mayor, Donald Huish; Councilmembers Margaret Morales, Jose Montano, Danya Acosta, Ray Shelton, Michael Baldenegro and Richard Acosta; City Manager, Ana Urquijo; Deputy City Manager, Luis Pedroza; City Clerk, Alma Andrade; Deputy City Clerk, Cynthia Acuna-Robles; Community Services and Economic Development Director, Jennifer Smith; IT Manager, Joel Camacho; and Economic Development/CMO Project Coordinator, Damian Dorame.

Neighborhood Resources & Grants Director, Xenia Gonzalez, presented the priorities outlined in the Consolidated Plan 2024-2028 and staff's proposed use of entitlement funds for the Annual Action Plan FY2024 to those in attendance.

HUD's allocation to the City of Douglas in CDBG funds for fiscal year 2024 is \$171,181. The funding for FY 2024 has been designated as follows: Infrastructure improvements – installation of infrastructure to include curbing, sidewalk, ADA ramps and street lighting on 15th Street from Washington Avenue to Airport Road, located in Census Tract 7 in Douglas, Arizona.

The questions asked by Councilmembers and staff response were as follows:

Question: "Is Rogers Avenue, which is where the newly city-acquired animal shelter is located, going to be included in the FY24 proposed activities?"

Response: "Not at this time. We receive a limited amount of funding and select projects based on cost estimates to complete those projects. If funding allows, that area could be a consideration or it could be done in another year of the 5-year cycle."

Question: "How does staff select one project over another? How is priority identified and/or established?"

Response: "Based on need and overall benefit. This area is high-traffic area (pedestrian and vehicular) so the overall benefit to the community is greater than other proposed projects."

Question: "Which areas of the City are considered LMI? It seems that the proposed area may not be LMI – what is the basis for determining LMI areas?"

Response: "HUD provides a map for all of the communities in their jurisdiction based on Census demographic data. They update their maps every several years and those areas may change. We are taking advantage of the existing LMI areas outlined in the current map to make necessary improvements, before any changes to the maps occur."

No negative comments were received.

The public hearing was adjourned at 5:02 p.m.

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Coronado Courts (LIHTC multifamily property)
Coronado Courts (LIHTC multifamily property)
Summer Crossings (Multifamily – mixed property)
Casas de Esperanza (Multifamily low-income)
Sun-Ray (Multifamily income-based)
Sonora Vista (Multifamily – mixed property)
Cochise Villas (USDA-RD Property)

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4. Public Notices

City of Douglas
Consolidated Plan
and
Annual Action Plan
Fiscal Year 2024-2028

REVISED SUMMARY OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

The Consolidated Plan for Fiscal Years 2024-2028 and Annual Action Plan for Fiscal Year 2024 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 30 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Neighborhood Resources and Grants Director, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 on or before July 8, 2024.

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 Neighborhood Resources and Grants office at City Hall and on the City of Douglas website, www.douglasaz.gov beginning on June 6, 2024.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, a public hearing was held on May 28, 2024 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 4:50 p.m. on July 10, 2024, at City Hall, 425 E. 10th Street, Douglas, AZ.**

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 FY24 for the City of Douglas is \$171,181.

Based on feedback and comments received, the proposed activities during the 5-year entitlement cycle will identify specific projects to be funded that meet the goals and objectives identified in the 2024-2028 Consolidated Plan.

AFFIDAVIT OF PUBLICATION

State of Florida, County of Duval, ss:

Laquansay Nickson Watkins, being first duly sworn, deposes and says: That (s)he is a duly authorized signatory of Column Software, PBC, duly authorized agent of Herald/Review Media, a newspaper printed and published in the City of Sierra Vista, County of Cochise, State of Arizona, and that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the herein attached was printed and published correctly in the regular and entire issue of said Herald/Review Media.

PUBLICATION DATES:
Jun. 5, 2024

NOTICE ID: LgYapzOR3AnIPvsDEBZ5
NOTICE NAME: Public Notice REVISED CDBG ConPlan AAP FY24

REQUEST OF

Xenia Gonzalez

I declare under penalty of perjury that the foregoing is true and correct.

By: Laquansay Nickson Watkins

VERIFICATION
State of Florida
County of Duval



Subscribed in my presence and sworn to before me on this: 06/11/2024

Deborah A. Packer

Notary Public
Notarized remotely online using communication technology via Proof.

PUBLIC NOTICE

City of Douglas
Consolidated Plan
and Annual Action Plan
Fiscal Year 2024-2028
REVISED SUMMARY OF
THE CONSOLIDATED PLAN
AND ANNUAL ACTION PLAN
The Consolidated Plan for
Fiscal Years 2024-2028
and Annual Action Plan for
Fiscal Year 2024 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 Develop-
ment Block Grants (CDBG)
program.
The City participates in the
CDBG program and is re-
quired 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 perfor-
mance.
Federal regulations require
that this summary be pub-
lished in one or more local,
general circulation newspa-
pers. This summary describes
the purpose and objectives of
the plan, type and location
of activities and the location
of the complete document.
Citizens have 30 days to
review the document and
submit comments. Citizens'
comments on this plan should
be submitted to the Neighbor-
hood Resources and Grants
Director, City of Douglas, 425
East 10th Street, Douglas, AZ
85607 on or before July 8,
2024.
All citizen comments will be
considered in preparing the
final Annual Action Plan. A
summary of those comments
or views, and a summary of
any comments or views not
accepted and the reasons
therefor, will be attached to
the final Annual Plan.
Copies of the draft Con-
solidated Plan and Annual
Action Plan will be available
for inspection and review at
the Neighborhood Resources
and Grants office at City Hall
and on the City of Douglas
website, www.douglasaz.gov
beginning on June 6, 2024.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan develop-
ment process, a public hear-
ing was held on May 28, 2024
at 4:00 PM. The purpose of

the public hearing is to obtain
the views of citizens, public of-
ficials 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 4:00
p.m. on July 10, 2024, at
City Hall, 425 E. 10th Street,
Douglas, AZ.

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 descrip-
tion 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 FY24 for the City
of Douglas is \$171,181.
Based on feedback and com-
ments received, the proposed
activities during the 5-year
entitlement cycle will identify
specific projects to be funded
that meet the goals and objec-
tives identified in the 2024-
2028 Consolidated Plan.
Publish: June 5, 2024

City of Douglas
Consolidated Plan
and
Annual Action Plan
Fiscal Year 2024-2028

SUMMARY OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

The Consolidated Plan for Fiscal Years 2019-2023 and Annual Action Plan for Fiscal Year 2024 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 Neighborhood Resources and Grants Director, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 on or before July 5, 2024.

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 Neighborhood Resources and Grants office at City Hall and on the City of Douglas website, www.douglasaz.gov beginning on June 4, 2024.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, a public hearing will be held on May 28, 2024 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 4:50 p.m. on July 10, 2024, 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 2024-2028 is as follows:

2024: New Infrastructure – sidewalk, curbing & lighting within LMI areas in CT7

2025: Public facilities improvements – ADA accessibility (Visitor Center, Library, City Hall, etc)

2026: Sewer improvements in LMI area(s) of City of Douglas

2027: Infrastructure improvements in scattered LMI areas of Douglas (curb, sidewalk, ADA ramps)

2028: Infrastructure improvements in scattered LMI areas of Douglas (curb, sidewalk, ADA ramps)

AFFIDAVIT OF PUBLICATION

State of New Jersey, County of Hudson, ss:

Kevin Richman, being first duly sworn, deposes and says: That (s)/he is a duly authorized signatory of Column Software, PBC, duly authorized agent of Herald/Review Media, a newspaper printed and published in the City of Sierra Vista, County of Cochise, State of Arizona, and that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the hereto attached was printed and published correctly in the regular and entire issue of said Herald/Review Media.

PUBLICATION DATES:
May 22, 2024

NOTICE ID: 78csxMZKcM0fH968l0XGM
NOTICE NAME: Public Notice CDBG Con-Plan 2024-28

REQUEST OF

Xenia Gonzalez

I declare under penalty of perjury that the foregoing is true and correct.


(CN) (S)

SHANNEA H HOLMES
NOTARY PUBLIC
STATE OF NEW JERSEY
My Commission Expires August 1, 2025

VERIFICATION

State of New Jersey
County of Hudson

Subscribed in my presence and sworn to before me on this: 06/24/2024



Notary Public
Notarized remotely online using communication technology via ProProfs.

PUBLIC NOTICE

City of Douglas
Consolidated Plan
and
Annual Action Plan
Fiscal Year 2024-2029

SUMMARY OF THE CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

The Consolidated Plan for Fiscal Years 2019-2023 and Annual Action Plan for Fiscal Year 2024 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 Neighborhood Resources and Grants Director, City of Douglas, 425 East 10th Street, Douglas, AZ 85907 on or before July 5, 2024.

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 Neighborhood Resources and Grants office at City Hall and on the City of Douglas website, www.douglasaz.gov

beginning on June 4, 2024.

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, a public hearing will be held on May 28, 2024 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 4:00 p.m. on July 10, 2024, 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.

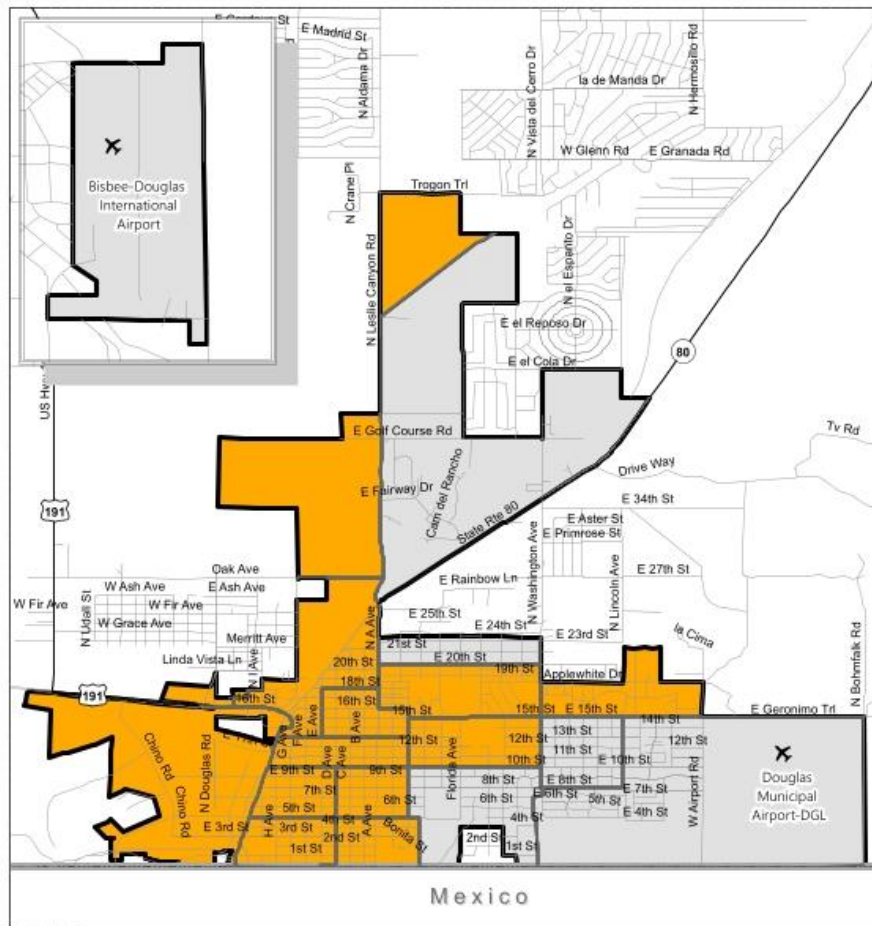
This plan sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year, determines goals for individuals and households to be served, and describes the long-term plan and geographic location of the activities to be undertaken. 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 2024-2026 is as follows:

- 2024: New Infrastructure – sidewalk, curbing & lighting will in LMI areas in CT7
 - 2025: Public facilities improvements – ADA accessibility (Visitor Center, Library, City Hall, etc)
 - 2026: Sewer improvements in LMI area(s) of City of Douglas
 - 2027: Infrastructure improvements in scattered LMI areas of Douglas (curb, sidewalk, ADA ramps)
 - 2028: Infrastructure improvements in scattered LMI areas of Douglas (curb, sidewalk, ADA ramps)
- Publish: May 22, 2024

Grantee Unique Appendices

1. Maps



CITY OF DOUGLAS, ARIZONA

2024 - 2028 Consolidated 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% (FY 2023 UMSD)

Base Data

City of Douglas

Mexico and U.S. Border

Highway Routes

Roads

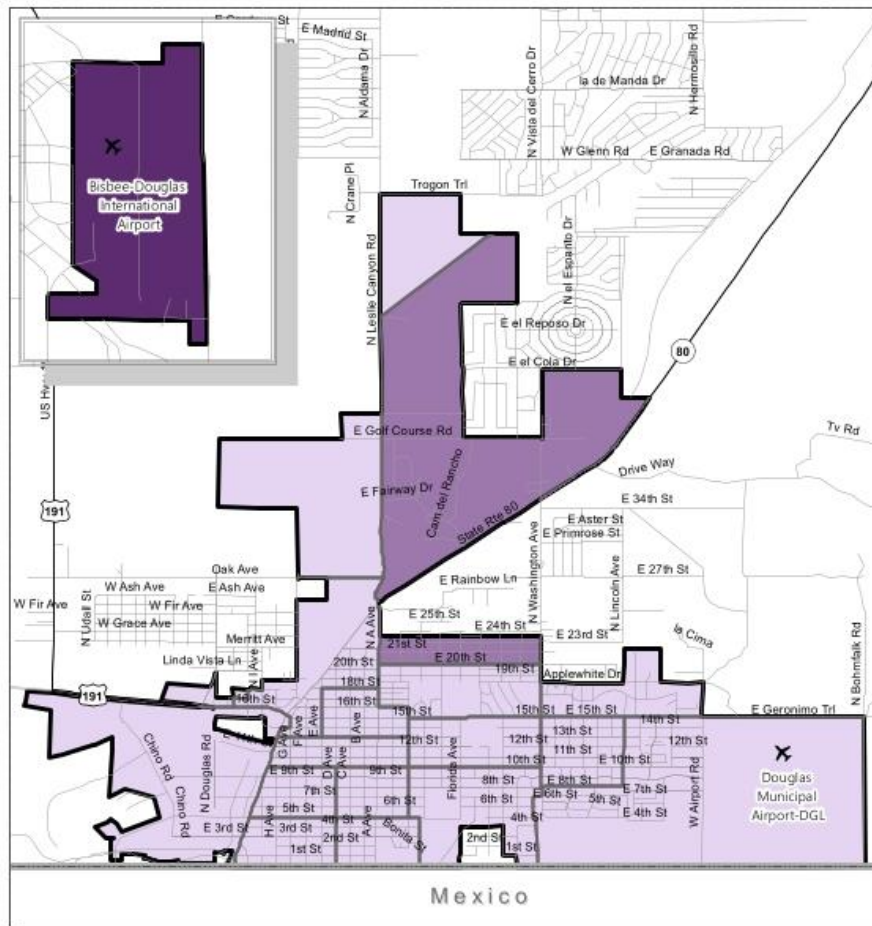
0 0.25 0.5 0.75 1 Miles



June 2024



Sources: U.S. TIGER/Line Shapefiles; HESD Open Data
FY 2023 Low-and-Moderate-Income Summary Data



CITY OF DOUGLAS, ARIZONA

2024 - 2028 Consolidated Plan

African American Population

Percent of African American
Population, by Block Group

- Less than 5%
- 5% - 9.99%
- 10% and Greater

Base Data

- City of Douglas
- Mexico and U.S. Border
- Highway Routes
- Roads

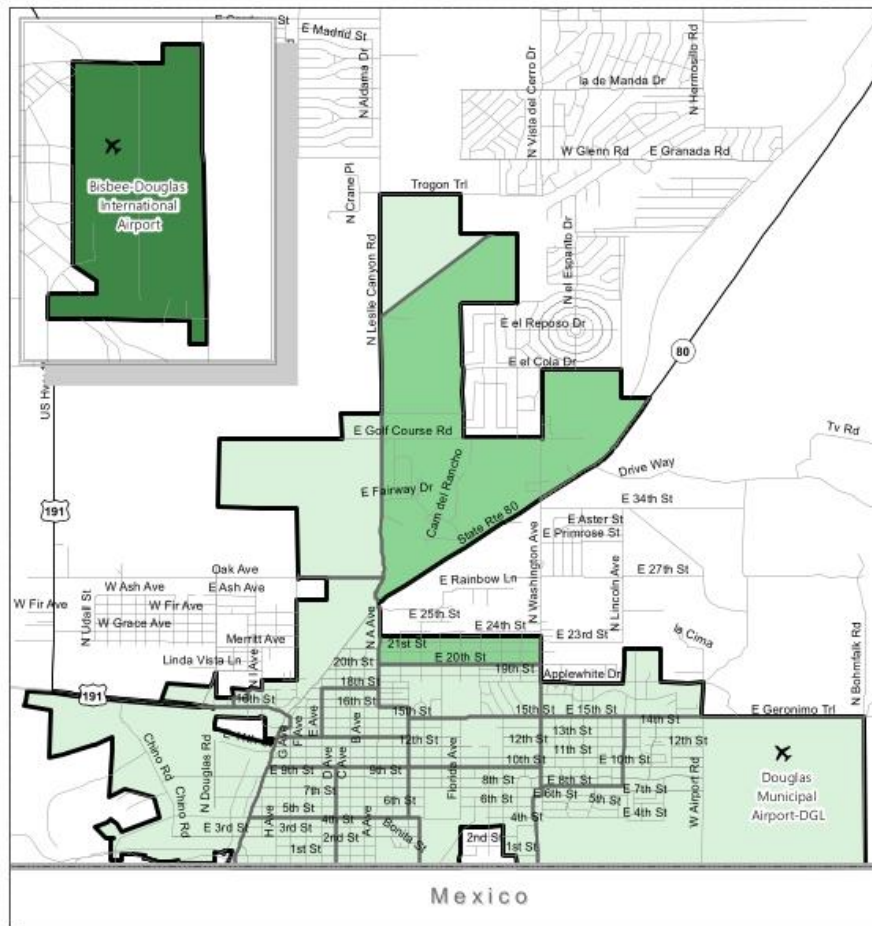
0 0.25 0.5 0.75 1 Miles



April 2023



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



CITY OF DOUGLAS, ARIZONA

2024 - 2028 Consolidated Plan

Hispanic Population

Percent of Hispanic Population,
by Block Group

- Less than 50%
- 50% - 74.99%
- 75% and Greater

Base Data

- City of Douglas
- Mexico and U.S. Border
- Highway Routes
- Roads

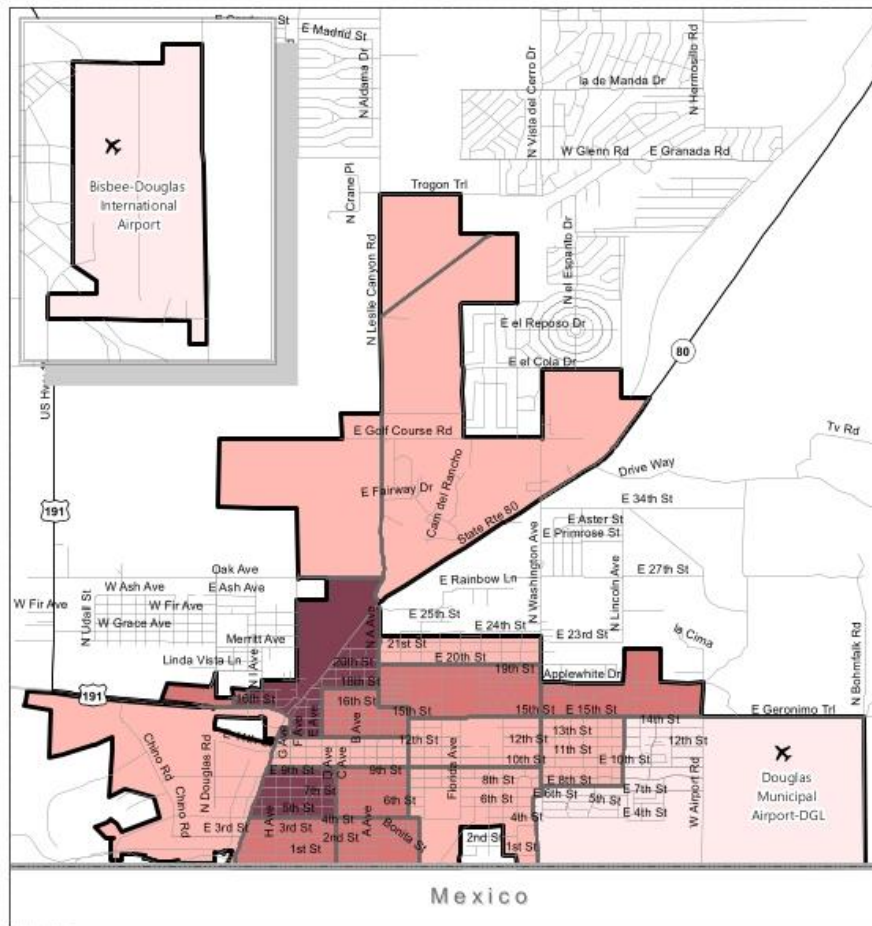
0 0.25 0.5 0.75 1 Miles



April 2023



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



CITY OF DOUGLAS, ARIZONA

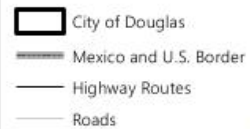
2024 - 2028 Consolidated Plan

Low Income Areas by Block Group

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



Base Data



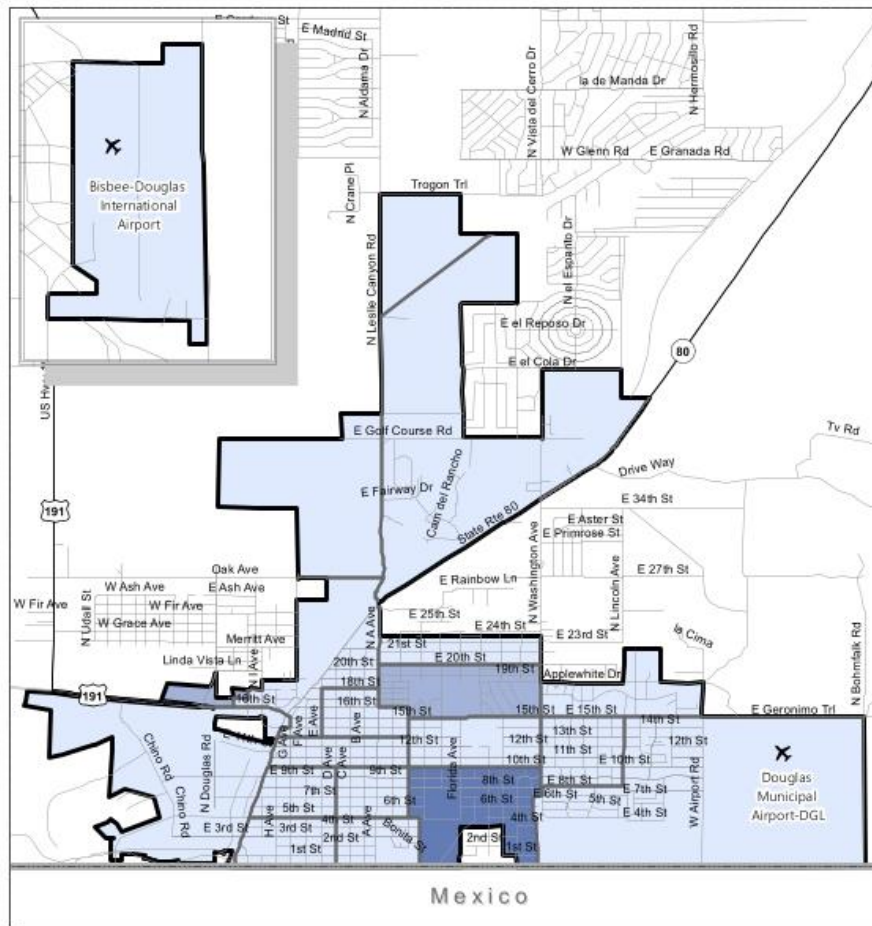
0 0.25 0.5 0.75 1
Miles



April 2023



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



CITY OF DOUGLAS, ARIZONA

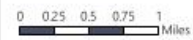
2024 - 2028 Consolidated Plan

Other Race Population

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



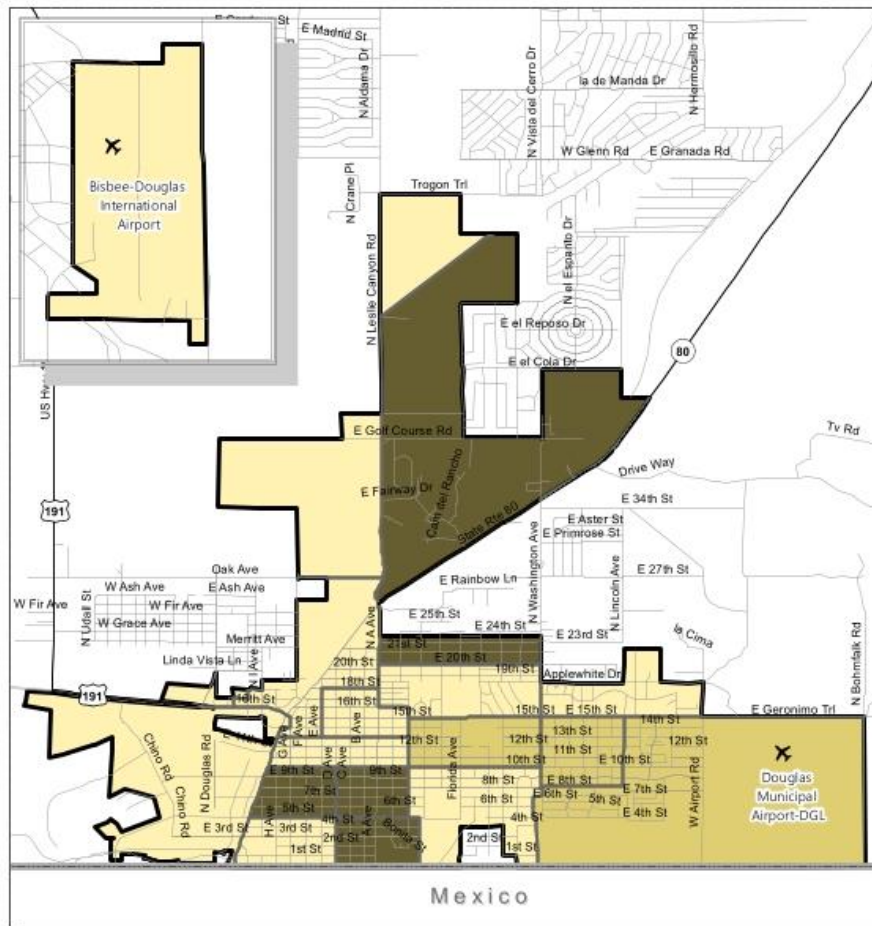
Base Data



April 2023



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



CITY OF DOUGLAS, ARIZONA

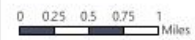
2024 - 2028 Consolidated Plan

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; HIF/D Open Data

Grantee SF-424's and Certification(s)

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 (1) above, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>		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"/>		
* b. Employer/Contributor Identification Number (EIN/TIN): <input type="text"/>		* c. UFI: <input type="text"/>
d. Address:		
* Street1:	<input type="text"/>	
* Street2:	<input type="text"/>	
* City:	<input type="text"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text"/>	
* Zip/Postal Code:	<input type="text"/>	
e. Organizational Unit:		
Department Name: <input type="text"/>		Division Name: <input type="text"/>
f. Name and contact information of person to be contacted on matters involving this application:		
* First Name:	<input type="text"/>	
* Middle Name:	<input type="text"/>	
* Last Name:	<input type="text"/>	
* Title:	<input type="text"/>	
TELEPHONE: <input type="text"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text"/>		* Fax Number: <input type="text"/>
* Email: <input type="text"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="US Department of Housing and Urban Development (HUD)"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14-213"/>	
CDA Title: <input type="text" value="Community Development Block Grant/Entitlement Grants - CDBG"/>	
* 12. Funding Opportunity Number: <input type="text" value="H-24-NR-04-516"/>	
* Title: <input type="text" value="Community Development Block Grant/Entitlement Grants - CDBG FY 2024"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text" value="encl001100005.pdf"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="CDBG Entitlement 2021-2025 Annual Action Plan Activity Submission for the City of Douglas, Douglas County, NE"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	a
* b. Program/Project	a
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2024
* b. End Date:	06/30/2025
18. Estimated Funding (\$):	
* a. Federal	171,161.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	171,161.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="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 18, Section 1001)	
<input checked="" type="checkbox"/> ** 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:	Mr.
* First Name:	Douglas
Middle Name:	C
* Last Name:	Buch
Suffix:	
* Title:	Mayor
* Telephone Number:	520-417-7192
Fax Number:	
* Email:	douglas.buch@lees.org
* Signature of Authorized Representative:	
* Date Signed:	7/24/24

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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 (0348-0040), 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 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 cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. 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.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for 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).
6. Will comply with all Federal statutes relating to nondiscrimination. 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 (20 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. 91-610), 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. §§290dd-3 and 290ee-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.
7. 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 or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§5501-5508 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by GSA Circular A-102

9. 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. §674), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, 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.
11. 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 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11958; (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).
12. 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.
13. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§456a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. 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.
17. 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."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 108(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
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Douglas, AZ	7/24/24

Standard Form 424B (Rev. 7-97) Back

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0039
Expiration Date: 02/28/2025

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 1942 (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.

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Prescribed by GSA Circular A-102

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 11735; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11980; (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
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Douglas, NE	7/24/24

SC-424D (Rev. 7-87) Back

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4540-0009
Expiration Date: 02/28/2025

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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. §§4728-4783) relating to prescribed standards or 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. §§260 dd-3 and 260 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.

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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-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 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11960; (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 105 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
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Douglas, KS	7/24/24

SF 424D (Rev. 7-97) Back

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-L.L.L., "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 75.



Signature of Authorized Official

7/24/24

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) 2024 [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.

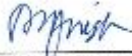
Excessive Force -- It has adopted and is enforcing:

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 35, Subparts A, B, J, K and R.

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



Signature of Authorized Official

7/24/24

Date

Mayer

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.

Appendix - Alternate/Local Data Sources

1	Data Source Name 2018-2022 American Community Survey
	List the name of the organization or individual who originated the data set. 2018-2022 American Community Survey 5-Year Estimates
	Provide a brief summary of the data set. 2018-2022 American Community Survey 5-Year Estimates
	What was the purpose for developing this data set? 2018-2022 American Community Survey 5-Year Estimates
	Provide the year (and optionally month, or month and day) for when the data was collected. 2018-2022
	Briefly describe the methodology for the data collection. 2018-2022 American Community Survey 5-Year Estimates
	Describe the total population from which the sample was taken. U.S. Population
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. U.S. Population
	2
Data Source Name 2008-2012 American Community Survey	
List the name of the organization or individual who originated the data set. 2008-2012 American Community Survey 5-Year Estimates	
Provide a brief summary of the data set. 2008-2012 American Community Survey 5-Year Estimates	
What was the purpose for developing this data set? 2008-2012 American Community Survey 5-Year Estimates	
Provide the year (and optionally month, or month and day) for when the data was collected. 2008-2012	
Briefly describe the methodology for the data collection. 2008-2012 American Community Survey 5-Year Estimates	

	<p>Describe the total population from which the sample was taken.</p> <p>U.S. Population</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>U.S. Population</p>
3	<p>Data Source Name</p> <p>HUD Housing Inventory Count 2023</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>HUD</p>
	<p>Provide a brief summary of the data set.</p> <p>HUD Housing Inventory Count 2023</p>
	<p>What was the purpose for developing this data set?</p> <p>HUD Housing Inventory Count 2023</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Homeless Population</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>January 2023</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>