

October 2024 - Substantial Amendment

Annual Action Plan for CDBG Program Year 2023/2024

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



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

1. Introduction

The 2023 Annual Action Plan for the City of Douglas has been prepared in response to a consolidated process developed by the U.S. Department of Housing and Urban Development (HUD) for its formula grant programs.

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

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

This section constitutes the 2023 Annual Action Plan of the Five-Year Consolidated Plan. It sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year (July 1, 2023 – June 30, 2024), determines goals for individuals and households to be served, and describes the implementation plan and geographic location of the activities to be undertaken. The formula allocation for the Community Development Block Grant program is \$165,619.

2. Summarize the objectives and outcomes identified in the Plan

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

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

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

For FY 2023, the City's focus will continue to be on public improvements to benefit the City's low- and moderate-income neighborhoods. The proposed public facility sewer improvements for FY2023 have been cancelled and the City is amending the 2023 Annual Action Plan to add a new project. The amended draft allocation for projects for FY 2023 is as follows: Public Facilities improvements at Veterans Park, located within an LMI area of the City of Douglas, within Census Tract 8.

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

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

3. Evaluation of past performance

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

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

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

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

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

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

4. Summary of Citizen Participation Process and consultation process

The city employs diverse methods to encourage on-going participation from residents, community service providers, and existing and potential community development partners. The participation process for the Annual Plan included public notices; a 30-day public comment period; two public hearings; and consultation with City staff and elected officials. In the end, the planning process yielded the active involvement and input of citizens, stakeholders, and governmental departments. Additionally, for the substantial amendment to the plan the City held a 30-day comment period beginning on October 11, 2024, until November 13, 2024. Another public hearing was held on the proposed substantial amendment on November 13, 2024 at City Hall.

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

5. Summary of public comments

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

No public comments were received at the Public Hearings on April 6, 2023. No public comments were received during the public hearing held on May 10, 2023. No public comments were received during the public review and comment period from April 10, 2023 – May 10, 2023.

Comments regarding the substantial amendment are to be determined.

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

Not applicable. No public comments were received; additionally, all public comments would be accepted and incorporated into the plan.

7. Summary

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

DRAFT

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

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

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

2. Narrative (optional)

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

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

3. Consolidated Plan Public Contact Information

Ms. Xenia Gonzalez
Neighborhood Resources and Grants Director
425 East Tenth Street
Douglas, Arizona 85607
(520) 417-7309
xenia.gonzalez@douglasaz.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

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

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

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

Priority is given to extremely and very low-income residents. The Housing Authority of Cochise County administers county-wide assistance (to include the City of Douglas) of two additional programs; HOPWA (Housing Opportunities for People With Aids) and VASH (Veterans Administration Supportive Housing) through collaboration with the Veterans Administration, which is targeted to assist homeless veterans throughout Cochise County.

The city has also worked in collaboration with the Catholic Community Services, "House of Hope" Domestic Violence Crisis Shelter, by providing information and referrals to persons who have been victims of domestic violence.

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

As needed, the city will provide technical assistance and information to private and public organizations that seek to provide affordable housing and support services to residents of Douglas. There are currently 11 affordable housing apartment complexes located within the city limits of Douglas.

3. Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

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

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

Not Applicable. The city does not receive ESG funding.

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

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

Table 2. Agencies, Groups, Organizations Who Participated

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

Table 2. Agencies, Groups, Organizations Who Participated

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

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

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

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

7. Narrative (optional)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AP-12 Participation – 91.105, 91.200(c)

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

Summarize citizen participation process and how it impacted goal-setting

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

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

Additionally, for the substantial amendment to the plan the City held a 30-day comment period beginning on October 11, 2024, until November 13, 2024. Another public hearing was held on the proposed substantial amendment on November 13, 2024 at City Hall.

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

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

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

Table 4. Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/ broad community	Placed required notices in the City newspaper, on City's website and broad distribution by email invite. Published April 5, 2023	None	Not applicable	
2	Public Hearing	Non-targeted/ broad community	Staff present at the Public Hearing held on April 6, 2023, were Luis Pedroza, Deputy City Manager; Elise Moore, Public Works Director; Rocio Garcia-Pedroza, Human Resources Manager; and Xenia Gonzalez, who facilitated the Hearing.	Proposed Use of funds: Sewer replacement along 15 th Street between A and B Avenues.	Not Applicable – all comments are accepted.	
3	Public Review and Comment Period	Non-targeted/ broad community	The plan was made available for public review and comment from April 10, 2023 – May 10, 2023.	None	Not applicable	

Table 4. Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/ broad community	The second public hearing to discuss the proposed 2023 Annual Action Plan held on May 10, 2023. Staff present at the public hearing included Ana Urquijo, City Manager; Luis Pedroza, Deputy City Manager; Alma Andrade, City Clerk; Cynthia Acuna-Robles, Deputy City Clerk; Jennifer Smith, Community Services and Economic Development Director and Xenia Gonzalez, who facilitated the hearing. No public were in attendance.	None.	Not applicable.	

Table 4. Citizen Participation Outreach						
Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad – 30-day comment period	Non-targeted/ broad community	Placed required notices in the City newspaper, on City's website and broad distribution by email invite. Published October 9, 2024	TBD	TBD	
6	Public Hearing	Non-targeted/ broad community	Staff present at the Public Hearing held on November 13, 2024	Proposed amendment to 2023 Annual Action Plan of funds: Veterans Park, Park Improvements	TBD	

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

1. Introduction

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

Table 5. Anticipated Resources

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

2. Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

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

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

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

3. If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

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

4. Discussion

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

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

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

Table 7. Goal Descriptions

1	Goal Descriptions	Public Facility and Infrastructure Improvements
	Goal Descriptions	Improve the quality of life for people living in low- and moderate-income (LMI) neighborhoods through public investment in facilities and infrastructure. The proposed public facility improvements for FY2023 will take place at Veterans Park located within an LMI area of the City of Douglas, within Census Tract 8. CDBG \$132,496
3	Goal Descriptions	Administration/Planning
	Goal Descriptions	Administration and planning of the CDBG program. Program administration addresses all outcomes, objectives and priority needs. CDBG \$33,123

AP-35 Projects – 91.220(d)

1. Introduction

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

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

As in the past, the city will continue to coordinate with public or social service providers to promote access to public services for special needs populations generally assumed to be low- and moderate-income. During the 2023/2024 program year, the City will fund improvements at Veterans Park.

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

Table 8. Project Information

#	Project Name
1	Program Administration 2023
2	Infrastructure Improvements FY23

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

These priorities were established through the City's Citizen Participation Plan when identifying priorities for the Five-Year Strategic Plan. Public participation was solicited through meetings with individuals and organizations, as well as through email correspondence. Public Hearings were held on April 6, 2023, May 10, 2023, and November 13, 2024 to discuss the Annual Action Plan and receive public comment.

AP-38 Project Summary

Table 9. Project Summary Information

1	Project Name	Program Administration 2023
	Target Area	Citywide
	Goals Supported	Administration/Planning
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$33,123
	Description	Administration and planning of the CDBG program, to address all outcomes, objectives, and priority needs.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	21A General Program Administration - Overall program administration, including (but not limited to) salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring, and evaluation.
2	Project Name	Infrastructure Improvements FY23
	Target Area	Citywide
	Goals Supported	Public Facility and Infrastructure Improvements
	Needs Addressed	Public Improvements/Infrastructure
	Funding	CDBG: \$132,496
	Description	The proposed public facility improvements at Veterans Park for FY2023. This park is located in Census Tract 8.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The proposed park improvements offer a low- and moderate-income area benefit to all residents, including 1,000 low- and moderate-income residents of Census Tract 8 and beyond. The activities will improve the condition of City amenities for residents.
	Location Description	Veterans Park, 645 Dolores Avenue, Douglas, AZ 85607
	Planned Activities	03F Parks, Recreational Facilities

AP-50 Geographic Distribution – 91.220(f)

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

For the 2023/2024 Annual Action Plan, City of Douglas will provide assistance to low- and moderate-income areas of the city in addition to improving the city as a whole. Assistance will be made available for improvements to Veterans Park, 645 Dolores Avenue, Douglas, AZ 85607 in Census Tract 8 and is adjacent to many of the City's low- and moderate-income block groups.

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

The city estimates that 1,000 LMI persons citywide could benefit from this project.

Table 10. Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

2. Rationale for the priorities for allocating investments geographically

The City's rationale for allocating investments semi-geographically is dependent upon the location of low- and moderate-income populations, which are most concentrated in the areas with the highest percentage of low- and moderate-income Census Block Groups. The proposed project site is located at 645 Dolores Avenue, Douglas, AZ 85607 in Census Tract 8 and is adjacent to many of the City's low- and moderate-income block groups.

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

3. Discussion

City of Douglas has identified infrastructure projects to implement the goals of the Strategic Plan during the FY2023 project year Annual Action Plan. The park improvements at Veterans Park will benefit low- and moderate-income persons primarily within southwestern portion of the City.

AP-55 Affordable Housing – 91.220(g)

1. Introduction

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

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

Table 12. One-Year Goals for Affordable Housing by Support Type	
One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

2. Discussion

Not Applicable.

AP-60 Public Housing – 91.220(h)

1. Introduction

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

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

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

The City of Douglas does not currently have public housing units; however, as mentioned above the Housing Authority of Cochise County administers the Section 8 Housing Choice Voucher program including the allocation of 193 vouchers from the City of Douglas, which were transferred to HACC on January 1, 2023. The HA works with the Continuum of Care, other agencies and providers to fill gaps for emergency assistance, temporary relocation assistance, housing for veterans, and other special circumstances.

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

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

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

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

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

5. Discussion

Not Applicable

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

1. Introduction

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

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

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

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

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

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

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

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

3. Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that

individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Catholic Community Services of Southern Arizona operates a local shelter for men and women who are victims of domestic violence. The Housing Authority of Cochise County (HACC) operates the VASH (Veteran's Administration Supportive Housing) program throughout the County, which benefits local Veterans with housing assistance. The HACC also operates the HOPWA (Housing Assistance for Persons With AIDS) program, which also benefits Douglas residents. Several other not-for-profit agencies, local and regional, also offer housing assistance and other supportive services to persons who are homeless.

- 4. Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

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

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

5. Discussion

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

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

1. Introduction

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

2. Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

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

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

3. Discussion

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

AP-85 Other Actions – 91.220(k)

1. Introduction

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

2. Actions planned to address obstacles to meeting underserved needs

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

3. Actions planned to foster and maintain affordable housing

The City will continue to seek other funding sources, such as HOME, State Housing Fund, for housing rehabilitation programs. There continues to be a great need for these programs in the community, and funding sources are scarce.

4. Actions planned to reduce lead-based paint hazards

The city will incorporate all HUD requirements concerning lead-based paint abatement into its housing rehabilitation programs, will see that program participants are informed about lead-based paint hazards and will see that all abatement work is undertaken by qualified contractors who have completed US HUD and EPA lead training courses.

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

Because the nature of poverty is complex and multi-faceted, the City will attempt to allocate CDBG funds for services to very low-income households. CDBG can provide funding for meeting these critical basic needs, but these efforts will be constrained by the amount of funds available and competing priority needs.

6. Actions planned to develop institutional structure

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

7. Actions planned to enhance coordination between public and private housing and social service agencies

The city maintains a close relationship with state, regional, and county organizations that provide assistance to low- and moderate-income persons as well as the homeless.

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

8. Discussion

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

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

1. Introduction

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

The City of Douglas anticipates no program income to be available during the year. In the event that program income is received funds will be distributed among active eligible CDBG activities. The City has not identified funds for urgent need activities at this time; however, the percentage of overall benefit to low- and moderate-income persons is expected to be 100%. City of Douglas has calculated the percentage of overall benefit based on program year (2023/2024).

Appendix

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

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Appendix

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

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
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CITY OF DOUGLAS, ARIZONA

2023-2024 Annual Action Plan


Low and Moderate Income Areas by Block Group

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


 Less than 51%


 51% and Greater

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

 Sewer Improvements

Base Data

 City of Douglas

 Mexico and U.S. Border

 Highway Routes

 Roads

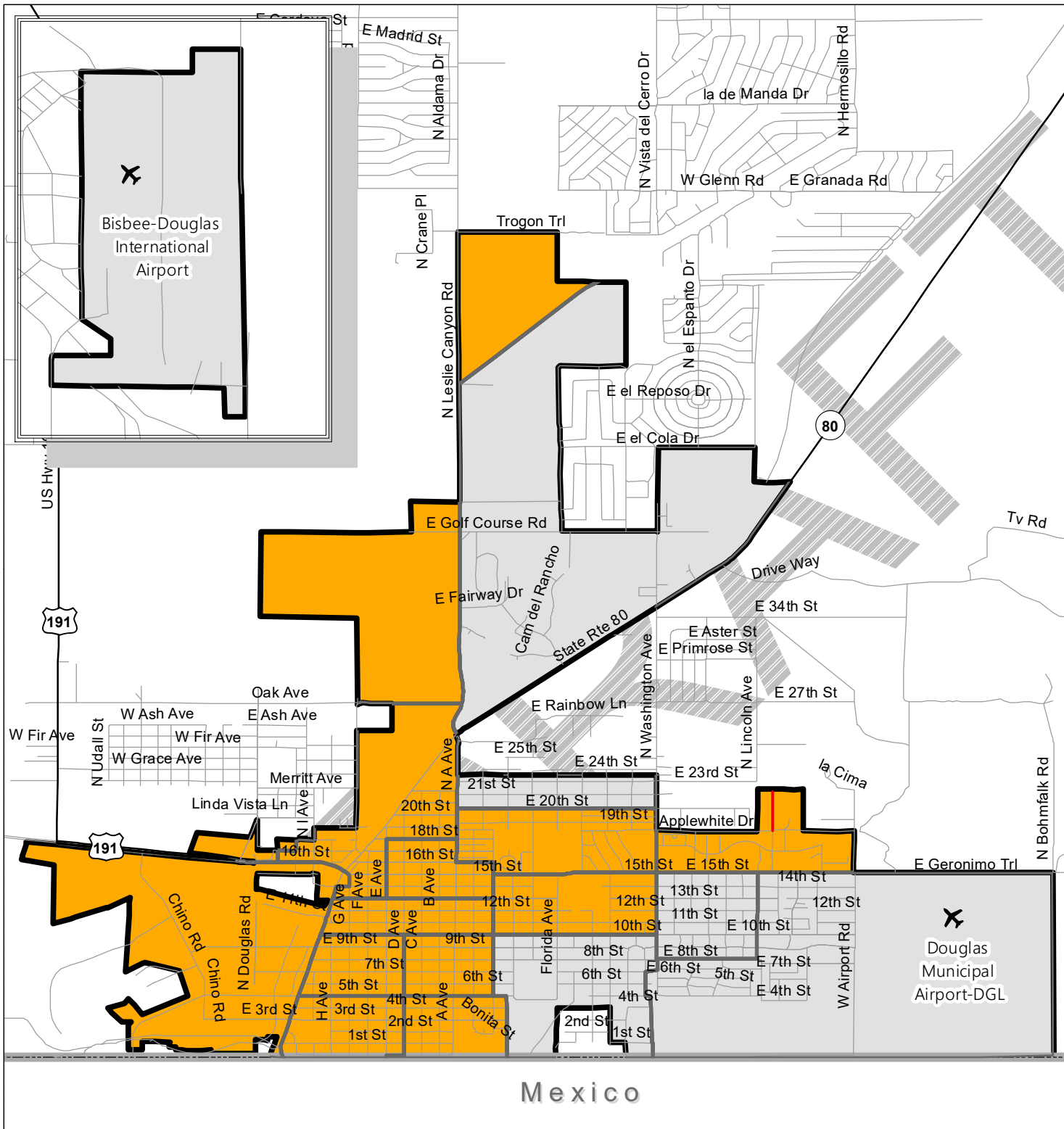
0 0.25 0.5 0.75 1
Miles



April 2023



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

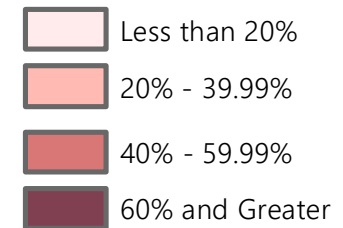


CITY OF DOUGLAS, ARIZONA

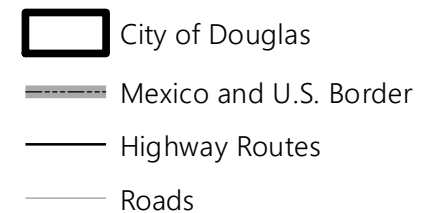
2023-2024 Annual Action Plan

Low Income Areas by Block Group

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



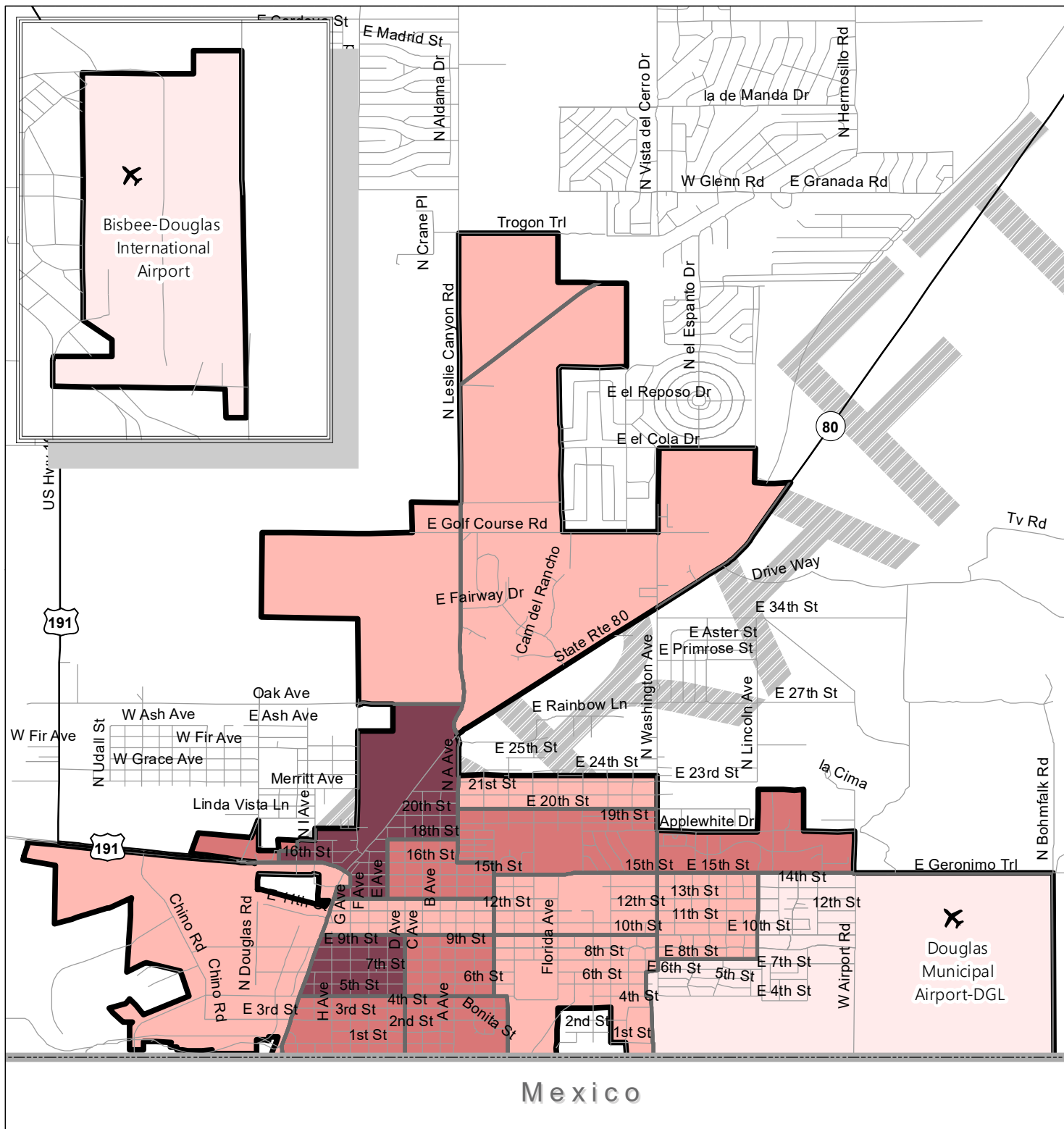
Base Data



April 2023



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

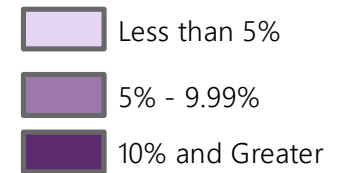


CITY OF DOUGLAS, ARIZONA

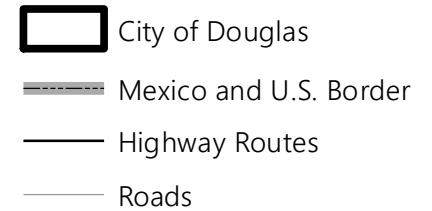
2023-2024 Annual Action Plan

African American Population

Percent of African American
Population, by Block Group



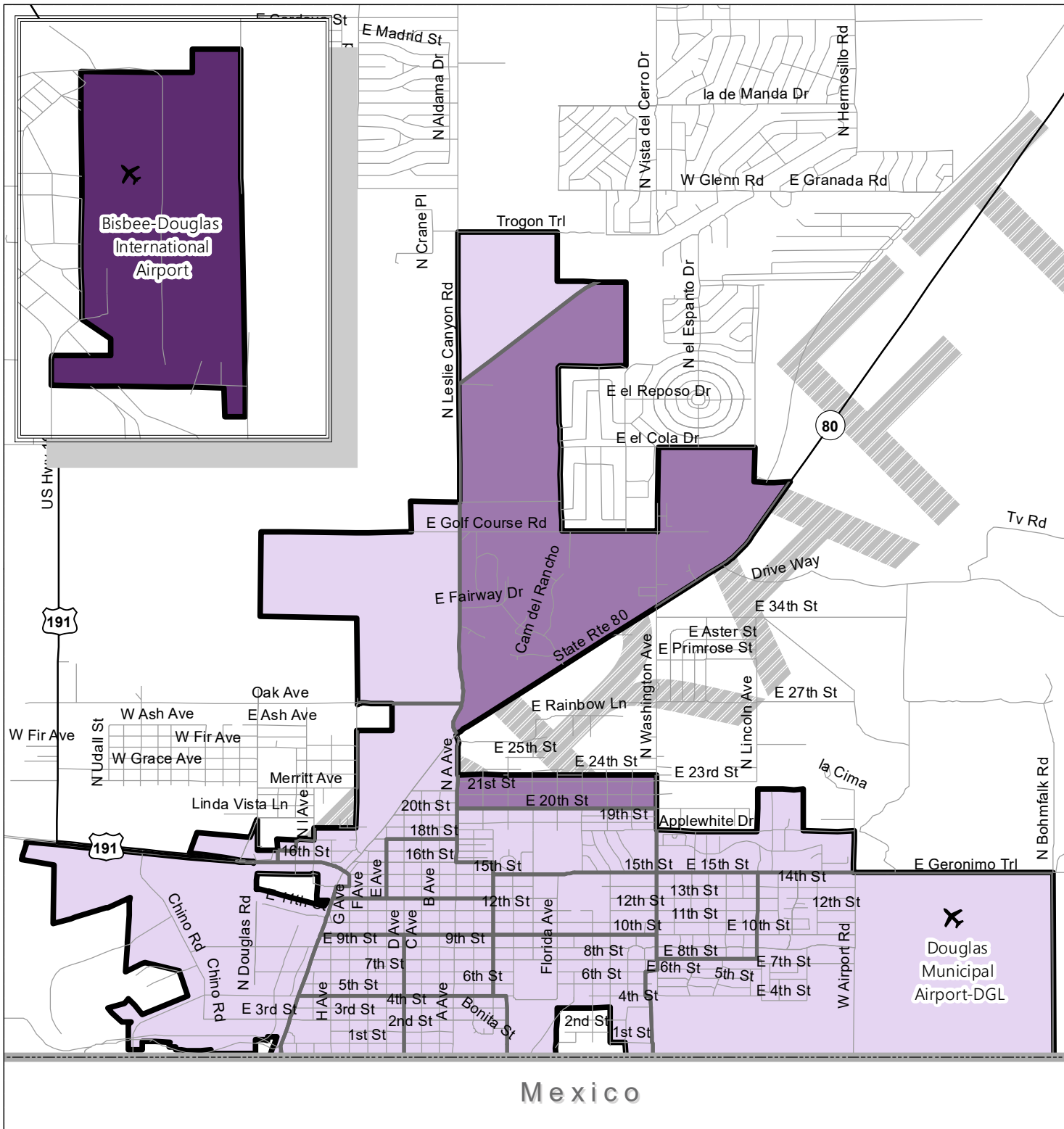
Base Data



April 2023



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

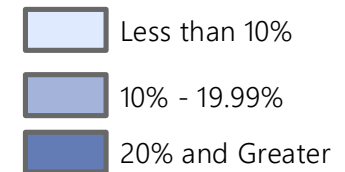


CITY OF DOUGLAS, ARIZONA

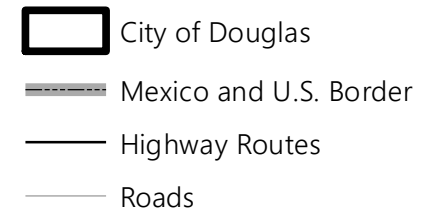
2023-2024 Annual Action Plan

Other Race Population

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



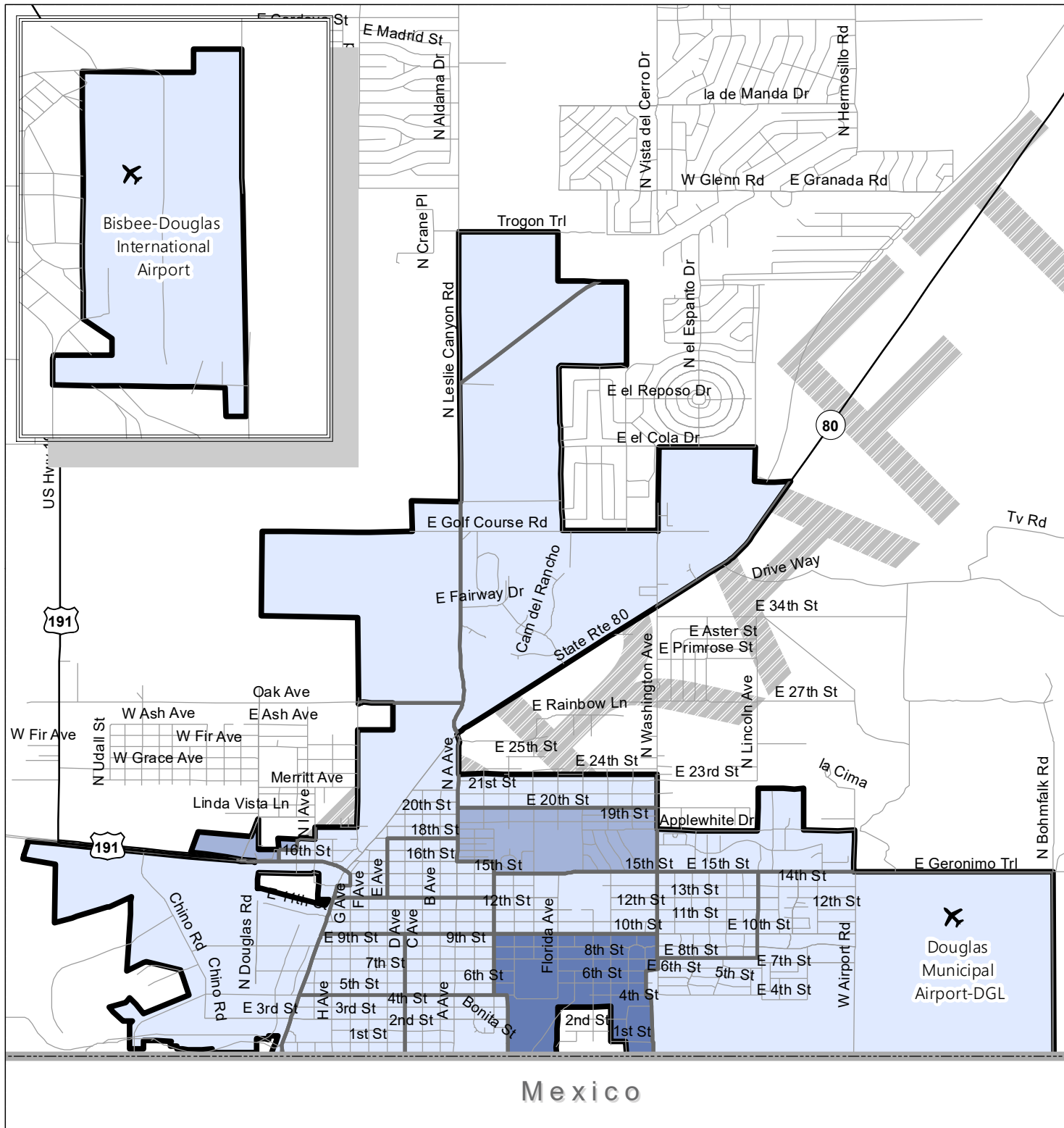
Base Data



April 2023



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

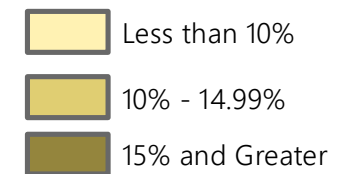


CITY OF DOUGLAS, ARIZONA

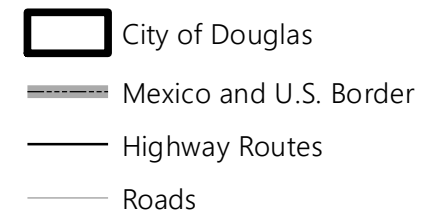
2023-2024 Annual Action Plan

Two or More Races Population

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



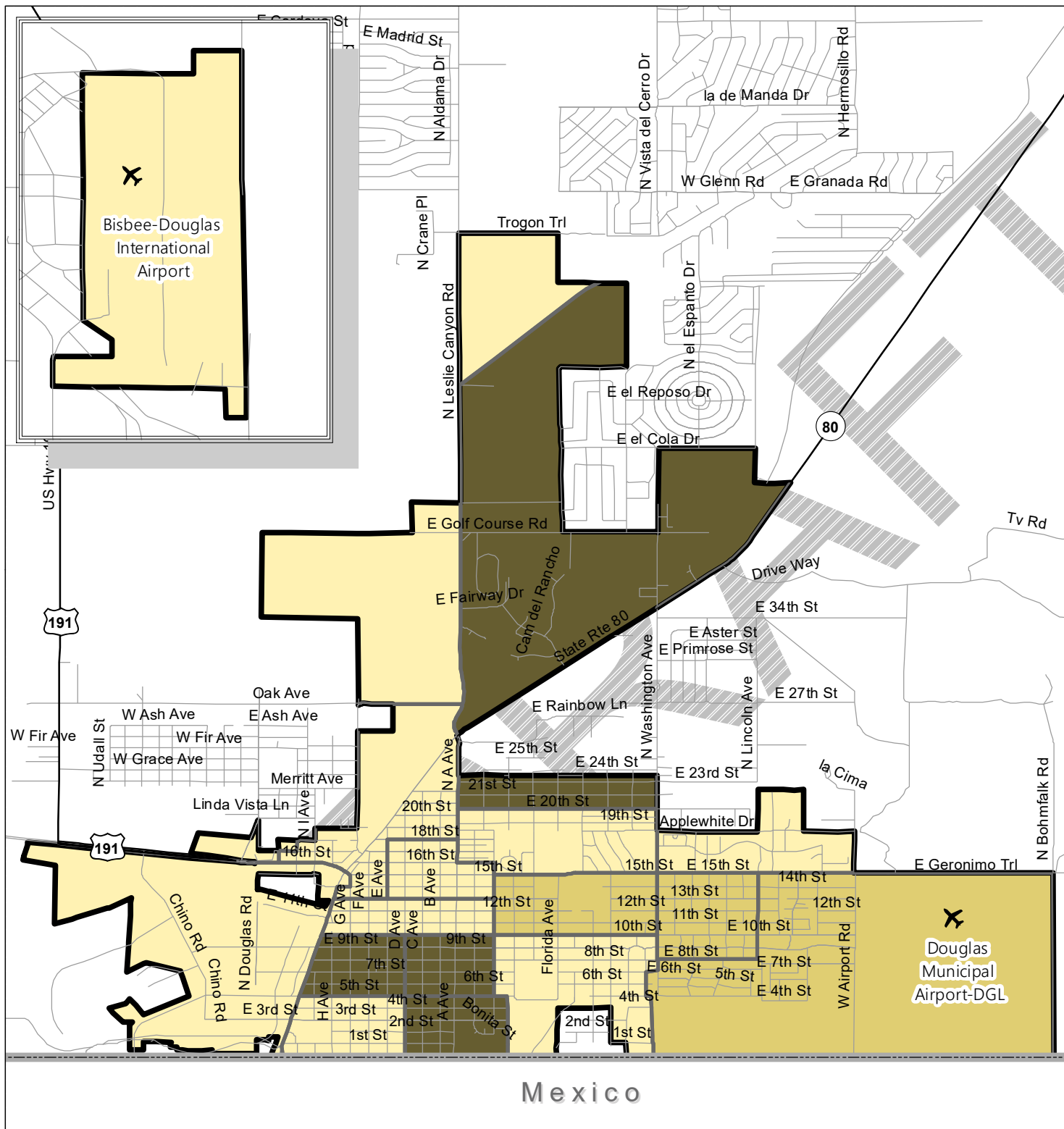
Base Data



April 2023



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



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City of Douglas
Annual Action Plan
Fiscal Year 2023

SUMMARY OF THE SUBSTANTIAL AMENDMENT TO THE ANNUAL ACTION PLAN

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

The City participates in the CDBG program and is required to prepare and submit an Annual Action Plan for HUD approval in order to receive CDBG funds.

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

Federal regulations require that this summary be published in one or more local, general circulation newspapers. This summary describes the purpose and priorities of the plan, type and location of activities and the locations of the completed document. Citizens have 30 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Neighborhood Resources and Grants Department, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 **on or before November 13, 2024.**

All citizen comments will be considered in the Substantial Amendment to the 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 Amended Annual Plan.

Copies of the draft Substantial Amendment to the Annual Action Plan will be available for inspection and review at the Neighborhood Resources and Grants Department office at City Hall and on the City website, www.douglasaz.gov beginning on October 11, 2024 until November 13, 2024.

SUMMARY OF PLAN DEVELOPMENT PROCESS

A public hearing on the Substantial Amendment to the Annual Action Plan has been scheduled at or about 5:45 p.m. on November 13, 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 amount of the allocation for FY2023 is \$165,619.

The amended draft allocation for projects for FY 2023 is as follows: Public Facilities improvements at Veterans Park, located within an LMI area of the City of Douglas, within Census Tract 8.

The City will provide technical assistance to citizens and groups representative of persons of low and moderate income that request such assistance in the review of program activities and program amendments. In addition, the City will make adequate and reasonable provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. Requests for special accommodations must contact the Neighborhood Resources and Grants Department office at the contact information above.

Please publish on: October 9, 2024

City of Douglas
Annual Action Plan
Fiscal Year 2023

SUMMARY OF THE ANNUAL ACTION PLAN

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

The City participates in the CDBG program and is required to prepare and submit an Annual Action Plan for HUD approval in order to receive CDBG funds.

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

Federal regulations require that this summary be published in one or more local, general circulation newspapers. This summary describes the purpose and priorities of the plan, type and location of activities and the locations of the completed document. Citizens have 30 days to review the document and submit comments. Citizens' comments on the plan should be submitted to the Neighborhood Resources and Grants Department, City of Douglas, 425 East 10th Street, Douglas, AZ 85607 **on or before May 10, 2023.**

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

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

SUMMARY OF PLAN DEVELOPMENT PROCESS

As part of the Plan development process, **a public hearing will be held at 5:15 PM on April 6, 2023, at City Hall.** The purpose of the public hearing is to obtain the views of citizens, public officials and agencies and other interested parties regarding the housing and community development needs of the jurisdiction. **A final public hearing on the Annual Action Plan has been scheduled at or about 5:45 p.m. on May 10, 2023, at City Hall.**

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

This plan sets forth a description of activities for the use of funds that are expected to become available during the coming Federal fiscal year, determines goals for individuals and households to be served, and describes the implementation plan and geographic location of the activities to be undertaken. The amount of the allocation for FY2023 is \$165,619.

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

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

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

Please publish on: April 5, 2023

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CDBG PUBLIC HEARING

April 6, 2023

5:15 P.M. – CITY HALL COUNCIL CHAMBERS

A public hearing was held on April 6, 2023 at 5:15 p.m. in the City Hall Council Chambers, in order to present the FY 2023 Annual Action Plan for CDBG Entitlement funds.

There were no members from the public present.

City staff members present were: Deputy City Manager, Luis Pedroza; Public Works Director, Elise Moore; Human Resources Manager, Rocio Garcia-Pedroza 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 (FY2023) 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 2023 is \$165,619. The funding for FY 2023 has been designated as follows: Infrastructure improvements – installation of sewer line on North Rogers Avenue, located in Census Tract 7 in Douglas, Arizona.

The public hearing was adjourned at 5:35 p.m.

**PUBLIC HEARING
CDBG ANNUAL ACTION PLAN FY 2023
Douglas, Arizona**

Time: 5:15 p.m.

Date: April 6, 2023

Facilitator: Xenia Gonzalez

Place/Room: City Council Chambers

[illegible]

CDBG PUBLIC HEARING

May 10, 2023

5:45 P.M. – CITY HALL COUNCIL CHAMBERS

A public hearing was held on May 10, 2023 at 5:45 p.m. in the City Hall Council Chambers, to receive public comments on the FY 2023 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, Mitch Lindemann, Ray Shelton, Michael Baldenegro and Jose Grijalva; 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 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 (FY2023) to those in attendance.

HUD's allocation to the City of Douglas in CDBG funds for fiscal year 2023 is \$165,619. The funding for FY 2023 has been designated as follows: Infrastructure improvements – installation of sewer line on North Rogers Avenue, located in Census Tract 7 in Douglas, Arizona.

The public hearing was adjourned at 5:51 p.m.

**PUBLIC HEARING
CDBG ANNUAL ACTION PLAN FY 2023
Douglas, Arizona**

Time: 5:45 p.m.		Date: May 10, 2023	
Facilitator: Xenia Gonzalez		Place/Room: City Council Chambers	
Name	Organization	Phone	E-Mail
<u>City Staff:</u>			
Mayor Donald Huish	City of Douglas	417-7302	donald.huish@douglasaz.gov
Councilmember Margaret Morales, Ward 1	City of Douglas	417-7302	margaret.morales@douglasaz.gov
Councilmember Mitch Lindemann, Ward 2	City of Douglas	417-7302	mitch.lindemann@douglasaz.gov
Councilmember Ray Shelton, Ward 4	City of Douglas	417-7302	ray.shelton@douglasaz.gov
Councilmember Michael Baldenegro, Ward 5	City of Douglas	417-7302	michael.baldenegro@douglasaz.gov
Councilmember Jose Grijalva, Ward 6	City of Douglas	417-7302	jose.grijalva@douglasaz.gov
Ana Urquijo	City of Douglas	417-7303	ana.urquijo@douglasaz.gov
Luis Pedroza	City of Douglas	417-7319	luis.pedroza@douglasaz.gov
Alma Andrade	City of Douglas	417-7301	alma.andrade@douglasaz.gov
Cynthia Acuna-Robles	City of Douglas	417-7302	cynthia.acuna-robles@douglasaz.gov
Jennifer Smith	City of Douglas	732-0680	jennifer.smith@douglasaz.gov

SF-424 and SF-424D

DRAFT

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

05/16/2023

4. Applicant Identifier:

B-23-MC-04-516

5a. Federal Entity Identifier:

B-23-MC-04-516

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Douglas, AZ

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

86-6000241

*** c. UEI:**

KFGNFMWR35A6

d. Address:

*** Street1:** 425 E. 10th Street

Street2:

*** City:** Douglas

County/Parish: Cochise County

*** State:** AZ: Arizona

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 85607-0000

e. Organizational Unit:

Department Name:

Housing

Division Name:

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

Prefix:

Ms.

*** First Name:**

Xenia

Middle Name:

*** Last Name:**

Gonzalez

Suffix:

Title: Neighborhood Resources & Grants Director

Organizational Affiliation:

*** Telephone Number:** 520-417-7385

Fax Number:

*** Email:** xenia.gonzalez@douglasaz.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

Community Development Block Grant/Entitlement Grants - CDBG

* 12. Funding Opportunity Number:

N/A

* Title:

Community Development Block Grant/Entitlement Grants - CDBG Annual Action Plan PY 2023

13. Competition Identification Number:

Title:

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

LowModIncome.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CDBG Entitlement 2023-2024 Annual Action Plan Activity Submission for the City of Douglas, Cochise County, AZ

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

8

* b. Program/Project

8

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

07/01/2023

* b. End Date:

06/30/2024

18. Estimated Funding (\$):

* a. Federal	165,619.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	165,619.00

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

☐

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒

c. Program is not covered by E.O. 12372.

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

Yes

☒

No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒

** I AGREE

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

Authorized Representative:

Prefix:

Mr.

* First Name:

Donald

Middle Name:

C.

* Last Name:

Huish

Suffix:

* Title:

Mayor

* Telephone Number:

520-417-7302

Fax Number:

* Email:

donald.huish@douglasaz.gov

* Signature of Authorized Representative:



* Date Signed:

5/11/23

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 (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
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. §§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.

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. §874), 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 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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 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.).
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 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 City of Douglas, AZ	DATE SUBMITTED 5/11/23

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
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.


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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).
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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 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.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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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.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Douglas, AZ	DATE SUBMITTED 5/11/23

Certifications

DRAFT

CERTIFICATIONS

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

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

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

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

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

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

5/11/23

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) 2023 [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

5/11/23
Date

Mayor
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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