

# Public Comments to 2020-2024 Consolidated Plan, Analysis of Impediments to Fair Housing, 2020 Annual Action Plan

## EMAIL #1

**From:** Paul Tigan <[paultigan@gmail.com](mailto:paultigan@gmail.com)>  
**Sent:** Wednesday, June 10, 2020 2:23 PM  
**To:** Shelly Ehenger <[SEhenger@cityofsalem.net](mailto:SEhenger@cityofsalem.net)>  
**Cc:** Bradfield, Eric <[ebradfield@gmail.com](mailto:ebradfield@gmail.com)>; Skillern, Sam <[sam@salem1f.org](mailto:sam@salem1f.org)>; Boatwright, Jeanne <[cjboat835@yahoo.com](mailto:cjboat835@yahoo.com)>  
**Subject:** 905/925 Cottage St NE and CDBG

Shelley -

I am writing in response to the request for comment on the five-year CDBG plan. I can't tell if you are asking for us to comment on the whole 5 year plan or the document that is specific to this year. In reviewing the document for this year [federal-programs-annual-action-plan-2020-2024], we note the potential \$472,000 award to DevNW at 905 and 925 Cottage St NE for the development of 14 units of apartments.

The Grant Neighborhood Association has been intimately involved in the pending proposal to rezone 905-925 Cottage Street NE as "commercial office" in order to meet the development goals of the potential purchaser, DevNW. The Neighborhood Association voted unanimously to oppose this rezoning as it is extremely out of character for the neighborhood and violates our neighborhood plan, which has been adopted by the City Council as policy of the city.

In our recent conversations with DevNW, they have made it clear that they cannot complete this project without first convincing the city to rezone the property as Commercial Office. When we discussed this with DevNW, they told us that they need the CO zone in order to turn the 925 Cottage NE property (the "parsonage", a single-family home) into an office for their company. They said they would use this to provide some services to their clients, but have also noted how they want this property to be a "home base" for their team when the Oregon Legislature is in session.

These types of uses do not conform with our neighborhood plan, the character of our neighborhood north of D Street, or (it would seem) the purpose of the CDBG program. We plan on opposing this zone change to the planning commission and the city council.

To be clear, at our last neighborhood association meeting, DevNW heard from the neighbors that they were not opposed to multi-family housing at the site but that rezoning the properties as commercial office first was putting the cart way before the horse and would have vast, uncertain impacts on the neighborhood.

Considering this, a few questions:

- is the award to DevNW finalized, or does it need to be approved by the city council or some other

entity?

- Is the purchase and development of commercial office space an appropriate use of the CDBG/HOME funds?
- what role will the city have in monitoring the development of this project if the funds are awarded?
- what is the meaning of the "eligibility Determination" map on the site? Do projects have to fall within the NRSA to be eligible for funding? Fall within the city limits? I'll note that 905-925 Cottage street NE is outside of the NRSA as it's depicted on that map. I'm just not sure if that matters.

Thank you for your time and consideration answering these questions. I've cc'd the rest of the exec. board members of the Grant Neighborhood Association to this email.

Thanks,  
Paul Tigan  
Land Use Chair  
Grant Neighborhood Association

## **RESPONSE TO EMAIL #1**

**From:** Shelly Ehenger  
**Sent:** Thursday, June 11, 2020 9:36 AM  
**To:** Paul Tigan <[paultigan@gmail.com](mailto:paultigan@gmail.com)>  
**Cc:** Bradfield, Eric <[ebradfield@gmail.com](mailto:ebradfield@gmail.com)>; Skillern, Sam <[sam@salem1f.org](mailto:sam@salem1f.org)>; Boatwright, Jeanne <[cjboat835@yahoo.com](mailto:cjboat835@yahoo.com)>  
**Subject:** RE: 905/925 Cottage St NE and CDBG  
**Importance:** High

Good morning.

Thank you for the comments and questions. Provided below are responses:

**QUESTION:** - is the award to DevNW finalized, or does it need to be approved by the city council or some other entity?

**RESPONSE:** The proposed 2020-2021 allocation of federal funds is staff recommendation. It will be on the June 22, 2020 City Council agenda for consideration. The City previously awarded DevNW HOME funds that will be combined with the proposed allocation to acquire and assist in the rehab of the 905 Cottage Street NE property. Staff recommendation is based upon the federal regulations, 2020-2024 Consolidated Plan Needs Assessment, City Council Strategic Plan goals, Oregon Housing and Community Services (OHCS) Statewide Housing Plan (2019 strategies), Grant Neighborhood Plan, recent State legislation regarding zoning and various strategies to increase available housing.

**QUESTION:** - Is the purchase and development of commercial office space an appropriate use of the CDBG/HOME funds?

**RESPONSE:** Yes this is an eligible activity.

**QUESTION:** - what role will the city have in monitoring the development of this project if the funds are awarded?

**RESPONSE:** Throughout the rehabilitation/construction period and 20 years after completion of the rehabilitation the project will be monitored to ensure the use as approved is maintained. Some of the monitoring will include maintaining established property standards and affordability restrictions. Property inspections will take place every other year. Financial condition of the property is reviewed annually. Noncompliance may result in the repayment of federal funds.

**QUESTION:** - what is the meaning of the "eligibility Determination" map on the site? Do projects have to fall within the NRSA to be eligible for funding?

**RESPONSE:** The map is used by subrecipients and citizens seeking assistance to determine if they reside in the City of Salem's boundaries. CDBG resources are restricted to the City limits. HOME is for both City limits of Salem and Keizer.

No, projects are not required to fall within the NRSA to be eligible. Applications submitted for consideration that are located in the NRSA receive bonus points.

**COMMENT:** I'll note that 905-925 Cottage street NE is outside of the NRSA as it's depicted on that map. I'm just not sure if that matters.

**RESPONSE:** Projects are not required to fall within the NRSA.

I am hopeful that the responses are addressing your questions. We are happy to provide additional clarification, if needed.

Have a great day.

Shelly

**Shelly Ehenger**

*Federal Programs Manager*

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## **EMAIL #2**

**From:** Christopher Jones <[CJones@ccswv.org](mailto:CJones@ccswv.org)>

**Sent:** Wednesday, June 10, 2020 8:41 AM

**To:** Shelly Ehenger <[SEhenger@cityofsalem.net](mailto:SEhenger@cityofsalem.net)>

**Subject:** Consolidated Plan questions

Hi Shelly,

I have a couple of questions about goals set by the 2020-2024 Consolidated Plan...

**Provide Support for Public Service Programs** - This goal aims to increase access to public services in Salem for at-need populations including the elderly, persons with disabilities, persons with substance abuse issues, and food insecure households. Maximum allowable amount for public service costs is 15%.  
**Would any of this support be available for private services, for example, non-profit food banks?**

**Program Administration** - Administration costs associated with HOME (maximum of 15%) and CDBG (maximum of 20%) **Is this directed toward City administration costs? Would any of this support be available to offset the administration costs of non-profits who own/manage properties with HOME and/or CDBG funding?**

Still browsing the documents. I'll let you know if I have further questions.

Good work!

Chris Jones

Fiscal & Policy Analyst  
 Catholic Community Services Foundation

503-856-7065 (direct)  
 971-719-0673 (mobile)

## **RESPONSE TO EMAIL #2**

Good afternoon Chris,

Thank you for the questions and our response is in blue:

**Provide Support for Public Service Programs** - This goal aims to increase access to public services in Salem for at-need populations including the elderly, persons with disabilities, persons with substance abuse issues, and food insecure households. Maximum allowable amount for public service costs is 15%.  
**Would any of this support be available for private services, for example, non-profit food banks?**

**RESPONSE:** Not for sure what a private service would be however food banks are an eligible activity. Are you making the distinction between a for profit or nonprofit entity?

**Program Administration** - Administration costs associated with HOME (maximum of 15%) and CDBG (maximum of 20%) **Is this directed toward City administration costs? Would any of this support be available to offset the administration costs of non-profits who own/manage properties with HOME and/or CDBG funding?**

**RESPONSE:** Yes, these funds are for City of Salem expenses related to program administration. Regrettably, the administration of non-profits who own-manage projects is allowed as a HOME CHDO activity as they work on eligible projects.

I hope the responses are addressing the questions, if not let me know and we can provide clarification.

Thanks.

Shelly

**Shelly Ehenger**

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## **Follow-up Question to Email #2:**

**From:** Christopher Jones <[CJones@ccswv.org](mailto:CJones@ccswv.org)>

**Sent:** Thursday, June 11, 2020 3:12 PM

**To:** Shelly Ehenger <[SEhenger@cityofsalem.net](mailto:SEhenger@cityofsalem.net)>

**Subject:** RE: Consolidated Plan questions

Thanks Shelly.

On my first question I'm wanting to understand what types of entities might be included under the category "public services". One way to read that might be, "governmental agencies".

I think you may have answered my question, but let me ask it more directly, "Would St Vincent de Paul Food Bank and Emergency Services be able to apply for support under this goal?"

Sounds like the answer would be yes??

Thanks again for responding.

Chris

## **RESPONSE TO FOLLOW-UP EMAIL #2**

Yes, support for a foodbank is an eligible activity. 😊

**Shelly Ehenger**

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