

Community Development Block Grant (CDBG)

Substantial Amendment #6:

2019 Annual Action Plan

Substantial Amendment #4:

2020 Annual Action Plan



Introduction

This document contains information related to the proposed amendments to the 2019 and 2020 Community Development Block Grant (CDBG) program Annual Action Plans. This is the sixth amendment to the 2019 AAP and fourth amendment to the 2020 AAP. Each of the previous amendments have been submitted to the Department of Housing and Urban Development (HUD) for review.

Purpose

The HUD waivers applicable to these amended Annual Action Plans are:

Citizen Participation Public Comment Period for Consolidated Plan Amendment

- a. Explanation: A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.
- b. Justification: Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.
- c. Applicability: This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year.

Citizen Participation Reasonable Notice and Opportunity to Comment

- a. Explanation: As noted above, the regulations at 24 CFR 91.105 (for local governments) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.
- b. Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

c. Applicability: This authority is in effect through the end of the 2020 program year.

Annual Action Plan Amendment Consultation Process

- Public Comment Period – October 20-October 25, 2021
- Public Hearing – November 8, 2021

Summary of public comments

To be completed after the October 25, 2021 comment period ends.

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

To be completed after the October 25, 2021 comment period ends.

The purpose of this amendment is to describe the City's proposed change in funding use for the program year 2019 CDBG and 2020 CDBG, including CDBG-CV3 resources. The proposed amendments consist of:

- (1) Reallocation of unspent 2019/2020 CDBG funds.

Funds are being changed or transferred to eligible activities that can be spent in a timely manner to address CDBG eligible and/or COVID related projects/programs, which are feasible, meet federal objectives and the priorities of low- to moderate-income residents in our jurisdiction.

Project Selection

The Consolidated Plan addresses three objectives and three outcomes defined by HUD, through the Community Planning and Development performance measurement framework, to address the needs of the community. The following are the three performance objectives and three outcomes:

Objectives

- Decent Housing
- Suitable Living Environment
- Economic Opportunities

Outcomes

- Availability/Accessibility
- Affordability
- Sustainability

The Federal Programs Division utilizes the above objectives and outcomes to determine the eligibility of programs and projects proposed as a part of this amendment process.

2019 Annual Action Plan

Amendment #6 to the 2019 Annual Action Plan

Allocate \$510,890 of 2019 unallocated funds

2020 Annual Action Plan

Amendment #4 to the 2020 Annual Action Plan

Allocate \$93,306 of 2020 unallocated funds

The combined CDBG resources available for this amendment is \$604,196. The specific program uses are provided below:

\$160,000 CV3

\$510,890 from CDBG 2019 unallocated

\$93,306 from CDBG 2020 unallocated

- **Mid-Willamette Valley Community Action Agency-** \$40,000 Multi-partner program

COS is proposing to reduce the original proposed \$200,000 grant to \$40,000 of CARES Act 2019 CV3 funding for childcare services, in partnership with Mid-Willamette Valley Community Action Agency and Early Learning HUB: providing support for new providers, support for existing providers and support for the providers re-entering the business. They will have the capacity to build their workforce with trained staff and serve low-income families with high-quality day-care services.

- **Salvation Army of Marion and Polk Counties-** \$197,474

COS is proposing to grant the \$160,000 of CARES Act 2019 CV3 originally assigned to MWVCAA and \$37,474 in 2019 unallocated funding, totaling \$197,474 for a managed program to assist LMI resident with up to three months in arrearages for rent. The program will specifically assist those persons unable to afford their rent due to the COVID 19 Pandemic.

- **Seed of Faith Ministries-** \$200,000

COS is proposing to grant an additional \$200,000 of unallocated 2019 funding for a managed transitional housing rehabilitation project. The program assists LMI residents with drug and alcohol behavioral counseling. The funds will be used for rehabilitation of the current location.

- **Yaquina Hall - \$350,000**

COS is proposing to grant an additional \$256,694 of unallocated 2019 and \$93,306 of unallocated 2020 funding for the rehabilitation of the historical Yaquina Hall for affordable housing units.

- **Bridgeway Recovery Services - \$54,196**

COS is proposing to grant \$54,196 of unallocated 2019 for purchase and installation of an emergency generator and purchase of satellite phones.

Should the proposed projects result in unspent, uncommitted funds this Amendment will be revised and presented again to the public and City Council for review and reconsideration.