

City of St. Louis
Community Development Administration



DRAFT-Substantial Amendment
2015 – 2019 Consolidated Plan
2019 Annual Action Plan

July 31, 2019

Introduction

In accordance with Title 24 Section 91.505 of the Code of Federal Regulations, the City of St. Louis is submitting this Substantial Amendment to its 2015-2019 Consolidated Plan. This document describes program and funding amendments as proposed by the Community Development Administration (CDA). Specifically, CDA proposes amending its Citizen Participation Plan to reflect current project timelines for the release of its Five-Year Consolidated Plan and its Annual Action Plan. In addition, CDA proposes to reprogram Community Development Block Grant (CDBG) funding allocated and unspent in previous funding years in the amount of **\$3,505,279.21**. These unused funds and their proposed reallocation are outlined below.

Regulatory Basis

24 CFR 91.505 requires that the City of St. Louis amend its approved Consolidated Plan whenever it plans to:

1. Make a change in its allocation priorities or a change in the method of distribution of funds;
2. Carry out an activity, using funds from any program covered by the Consolidated Plan, not previously described in the Annual Action Plan; or
3. Change the purpose, scope, location or beneficiaries of an activity.

The regulation further requires that the City identify in its Citizen Participation Plan the criteria used for determining what constitutes a substantial amendment. The City's approved Plan notes that a substantial amendment will be considered to exist when there is:

1. A transfer of funds from an existing line item to a new activity or to a new subrecipient or subgrantee which has not been funded in the current grant year; or
2. A change in excess of 10% for a funded subrecipient or subgrant activity (excludes activities administered by City Departments); or
3. A change in allocation priorities or a change in the method of distribution of funds;
4. An activity type not described in the Annual Action Plan is funded; or
5. A change to the purpose, scope, location, or beneficiaries of an activity; or
6. A change in priorities contained in the ConPlan.

The proposed changes meet at least one of these criteria, and as such require a substantial amendment.

Substantial Amendments

Amendment of Citizen Participation Plan

The following sections of the Citizen Participation Plan have been amended to reflect current timelines and schedules for the production of the 5-Year Consolidated Plan and Annual Action Plan:

Annual Action Plan

The Annual Action Plan is a one-year implementation strategy for the ConPlan, which must be submitted to HUD **at least 45 days prior** to the beginning of each program year (no later than November 15). Similar to the ConPlan, implementation of the City's Annual Action Plan is primarily carried out by CDA, the Department of Human Services and the Health Department. CDA is responsible for the overall coordination among the three entities in terms of planning, reporting and interfacing with HUD.

The law also calls for improved accountability of jurisdictions to the public. In that spirit and in compliance with the terms of the law, CDA will use the following procedures.

1. No later than **July 31 (changed from June 30)** of each year, CDA will publish its CDBG/HOME funding timeline for the following year. The timeline will be available on the CDA website: www.stlouis-mo.gov/cda.
2. No later than **July 31 (changed from June 30)** of each year, CDA will provide the Board of Aldermen with a copy of the draft CDBG/HOME Request for Proposals ("RFP") and solicit feedback on annual priorities. The comment period for the Aldermen should be **no less than ten (10) business days**.
3. No later than **August 31 (changed from June 30)** of each year, CDA will hold a public hearing to solicit feedback on annual CDBG/HOME priorities/activities.
4. By **August 31 (changed from July 30)** of each year, CDA will advertise the commencement of the CDBG/HOME proposal acceptance period. CDA shall provide approximately 30 days for the completion and submission of proposals.

Substantial Amendment

Identification of Funding Designated for Reprogramming

CDA reviewed present and past expenditures through the City's accounting system and through the use of standard reporting tools on the Department of Housing and Urban Development's Integrated Disbursement and Information System (IDIS). IDIS is a real-time, web-based computer application that provides financial disbursement, tracking, and reporting activities for certain HUD grant programs, including CDBG. Through this process, CDA has identified previously funded programs/activities with unspent funding. These projects/activities are listed in the table below:

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
13-29-95	Board of Public Service	BPS Neighborhood Capital Improvements	26,753.59
13-50-03	St. Louis Development Corporation	Neighborhood Commercial Districts	20,799.07

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
14-32-01	Community Development Administration	CDA Rehab Administration	312,175.84
14-90-00	Community Development Administration	CDA Administration	230,474.04
15-32-01	Community Development Administration	CDA Rehab Administration	85,468.73
15-50-06	St. Louis Development Corporation	Business Development Support	153,085
15-50-51	Justine Petersen Housing & Reinvestment Corp.	Microenterprise Technical Assistance and Lending	2,475.00
15-90-00	Community Development Administration	CDA Administration	50,415.39
16-11-08	Family Juvenile Court Division	Innovative Concept School	381.33
16-50-06	St. Louis Development Corporation	Business Development Support	87,000.00
16-90-00	Community Development Administration	CDA Administration	161,298.39
17-10-60	St. Louis Public Schools	SLPS Family Support Centers	7,216.59
17-11-96	Grace Hill Settlement House	Grace Hill After School Program	3,532.78
17-13-12	Myrtle Hilliard Davis Comprehensive Health Centers	Healthcare for Persons Experiencing Homelessness	4,166.64
17-14-22	Project Cope	Offender Re-entry Services	100,000.00
17-36-21	Home Services	Senior Home Security Minor Home Repair Program	64,139.32
17-36-28	Urban League of Metropolitan St. Louis	Urban League Minor Home Repair Program	12,829.20
17-40-24	Tower Grove Neighborhoods Community Development Corporation	South Grand Priority District: Changing Environments WIFI/Charging Access	50,000.00

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
18-10-35	Department of Recreation	Operation Brightside	92.12
18-10-60	St. Louis Public Schools	SLPS Family Support Centers	100,000.00
18-10-63	City Counselor's Office	Problem Property Team Program	6,176.92
18-11-08	Family Juvenile Court Division	Innovative Concept School	3,950.10
18-11-21	St. Louis Agency on Training and Employment	SLATE-Blue RecToTech	75,000.00
18-12-40	St. Louis Area Agency on Aging	Elderly Services	8.07
18-31-11	Herbert Hoover Boys & Girls Club	Out of School Youth Development Services	14,363.74
18-31-32	Fiance Management, Inc.	Fiance Early Learning Center	8,790.50
18-31-35	Guardian Angel Settlement Association	Childcare	2,750.35
18-36-36	The Board for Inner-City Missions	Summer Enrichment Programs	3,080.00
18-11-55	Community Development Block Grant 2018	Riverview West Florissant	25,000.00
18-11-63	St. Louis Intern Partnership	CDBG Community Internships	3,952.36
18-11-65	MERS Missouri Goodwill Industries	STL Youth Jobs	52,690.07
18-11-73	Emergency Medical Technician Academy	St. Louis Community College	30,000.00
18-11-95	Department of Recreation	Expanded Recreation	6,069.99
18-11-97	Better Family Life, Inc.	BFL Neighborhood Alliance	46,953

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
18-12-84	Carondelet Community Betterment Federation	CCBF Food and Nutritional Services	1,134.17
18-12-85	Guardian Angel Settlement Association	Food Pantry	1,795.77
18-12-95	Northside Youth and Senior Services	Northside Senior Meal Program	9,911.75
18-14-13	Prosperity Connections	Financial Capability 2018	0.10
18-14-20	Covenant House of Missouri	Covenant House of Missouri's Crisis Program	9,595.43
18-14-23	Criminal Justice Ministry	Release to Rent Re-entry Program	1,000.00
18-14-26	St. Louis Transitional Hope House, Inc.	Hope House PSH	512.08
18-14-61	Employment Connection	Re-entry Services	3,600.00
18-36-23	Harambee Youth Training Center	Harambee Tuckpointing/Youth Jobs	252.85
18-36-26	Carondelet Community Betterment Federation	Carondelet Minor Home Repair Program	400.00
18-36-32	Mission: St. Louis	Healthy Home Repair Program Construction Management	26,034.81
18-50-06	St. Louis Development Corporation	Business Development Support Program	50,000.00
18-50-22	International Institute of St. Louis	Microenterprise Development	1,833.52
18-90-03	City Counselor's Office	Legal Services Support Program	658.60
18-90-91	St. Louis Development Corporation	Capacity Building for Minority Contractors	11,769.33
19-90-00.01	Community Development Administration	Section 108 Loan Repayment	1,590,605.00
		Total	3,505,279.21

Funding Reprogramming Destination

The City of St. Louis continues to be committed to the priorities set forth in its 2015–2019 Consolidated Plan. As such, the City proposes to use the unspent funds from prior years on the following:

- **Choice Neighborhood Public Improvements:** CDA will use the funds allocated in this Substantial Amendment to fund the Public Improvements identified in the City’s Near North Side Choice application. Public improvements work for all phases will include the following:
 1. The installation of new site utility mains, manholes, inlets and distribution lines;
 2. The installation of sanitary sewer, storm sewer, potable water and electrical utilities and
 3. The installation of new roadways, driveways, parking lots, sidewalks, signs, landscaping and other site features. This will include new roadways into the newly developed site from 14th and 20th street as well as a new North to South street on the west side of the development which will run from Cass Avenue to O’Fallon Street.

The 2019 Annual Action Plan will be revised to reflect the reprogrammed funds.

Citizen Participation – Review of Draft Substantial Amendment and Public Hearing Notice (July 31, 2019)

In accordance with 24 CFR Part 91.105(c)(3) for local governments, the substantial amendment public notice was released for citizen review and comments on July 31, 2019. During the 30-day public comment period, from July 31, 2019–August 31, 2019, the Draft Substantial Amendment was made available during regular business hours between 8:00 a.m. and 5:00 p.m., Monday – Friday at CDA, which is located at 1520 Market St. (63103). In addition:

- The availability of the Draft Substantial Amendment was advertised in the *St. Louis American* and *St. Louis Post Dispatch* on August 1, 2019 and August 2, 2019, respectively.
- The Draft Substantial Amendment was available at the Central Branch of the St. Louis Public Library, which is located at 1301 Olive Street (63103).
- The Draft Substantial Amendment was available on the CDA website: <http://www.stlouis-mo.gov/cda>.
- The availability of the Draft Substantial Amendment was posted on the CDA Facebook page.
- CDA emailed the public notice to its CDBG mailing list, which includes approximately 300 organizations, elected officials, and other community stakeholders.
- CDA forwarded the public hearing notice to Mind’s Eye Radio to notify individuals with vision impairments.
- CDA translated the public notice to Spanish, Bosnian, Chinese, Filipino, French, and Vietnamese and forwarded it to the International Institute to notify persons with Limited English Proficiency.

CDA will hold a public hearing to review the Draft Substantial Amendment and provide an opportunity for public comments:

Thursday, August 15, 2019
CDA Boardroom
1520 Market Street – Suite 2000 (63103)
5:30 p.m.

Public Comments will be accepted until 5:00 p.m. on August 31, 2019. All comments should be addressed as follows:

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