

City of St. Louis
Community Development Administration



Substantial Amendment
2015 – 2019 Consolidated Plan

July, 2016

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 the reprogramming of Community Development Block Grant (CDBG) funding allocated and unspent in previous funding years in the amount of \$1,223,886.37. 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 so requires a substantial amendment.

Substantial Amendments

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 funding unspent. These projects/activities are listed in the table below:

| Contract No. | Program/Activity Name | Unexpended Amount |
|---------------------|--|--------------------------|
| 15-11-35 | Child Development and Food Pantry – Guardian Angel Settlement House | 1,201.36 |
| 14-10-60 | Community Education Centers – St. Louis Board of Education | 90,739.93 |
| 15-12-82 | Community Food Pantry & Senior Center Services Programs – City Seniors, Inc. | 5.00 |
| 14-36-24 | Down Payment & Closing Cost Asst. Program – Beyond Housing | 2,000.00 |
| 15-12-40 | Elderly Services – SLAAA | 8.04 |
| 16-29-97 | Emergency Shelter Rehabilitation – Department of Human Services | 500,000.00 |
| 15-50-53 | Entrepreneurship Support and Development Program – Small Business Empowerment Center | 25,000.00 |
| 15-11-85 | Expanded Recreation – Department of Parks, Recreation and Forestry | 18,835.04 |
| 15-14-11 | Fair Housing Assistance Program – Civil Rights Enforcement Agency | 8,328.78 |
| 16-14-11 | Fair Housing Assistance Program – Civil Rights Enforcement Agency | 38,500.00 |
| 15-90-04 | Federal Grants Administrative Support – Comptroller’s Office | 15.33 |
| 15-10-83 | Gateway EITC Tax Services Program – Gateway EITC Community Coalition | 3,724.72 |
| 15-11-36 | GSBC Youth Development Program – Gene Slay’s Boys Club of St. Louis, Inc. | 20,000.00 |
| 15-12-83 | Hamilton Heights Community Development Programs – Hamilton Heights Neighborhood Organization, Inc. | 821.06 |
| 14-31-48 | Hamilton Heights CBDO – Hamilton Heights Neighborhood Organization, Inc. | 3,102.00 |
| 15-12-41 | Health in Motion & Transportation Programs - Metropolitan Senior Citizen's Corporation, Inc. | 1,442.80 |
| 15-10-55 | Hi-Pointe Supplemental Nutrition & Referral Program – Hi-Pointe Center, Inc. | 10.00 |
| 15-14-12 | Housing Resource Center – St. Francis Community Services | 5,963.12 |
| 15-90-03 | Legal Services Support Program – City Counselor | 484.02 |
| 15-11-08 | Innovative Concept School – Family Court (Juvenile Division) | 273.07 |
| 16-11-66 | Job Training – MOKAN | 60,000.00 |

| Contract No. | Program/Activity Name | Unexpended Amount |
|---------------------|---|--------------------------|
| 08-33-56 | LCRA 2008 Acquisition Pool – Land Clearance for Redevelopment Authority | 25,000.00 |
| 12-33-56 | LCRA 2012 Acquisition Pool – Land Clearance for Redevelopment Authority | 217,300.00 |
| 14-11-32 | Northside Community Center – Northside After School Club | 27,499.27 |
| 15-10-35 | Operation Brightside – Department of Parks, Recreation and Forestry | 882.17 |
| 15-90-02 | PDA Administration – Planning and Urban Design Agency | 8,370.42 |
| 15-10-63 | Problem Property Team – City Counselor | 337.07 |
| 15-10-65 | Problem Property Team – Department of Public Safety | 6,608.33 |
| 15-10-64 | Problem Property Team - Municipal Court | 31.38 |
| 15-11-34 | Resources for Learning - Youth Learning Center | 13,889.63 |
| 15-36-19 | Riverview West Florissant Development Corporation - Handyman Program | 40,000.00 |
| 15-70-35 | SLDC Property Board-Up/Maintenance – St. Louis Development Corporation | 46,317.41 |
| 15-11-65 | STL Youth Jobs – MERS/Missouri Goodwill Industries | 15,247.32 |
| 15-10-60 | Truancy Prevention Program - St. Louis Board Of Education | 41,949.10 |
| | Total | 1,223,886.37 |

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:

- Near Northside Choice Neighborhoods Implementation Grant: The City of St. Louis will soon submit an application to the U.S. Department of Housing and Urban Development for a Choice Neighborhoods Implementation Grant for the Near North Side area, which is bounded by St. Louis Ave. on the North; Washington Ave. on the South; Highway 70 (and in some places the Mississippi River) on the East; and Elliott Ave. on the West. As a requirement, a total of 10% of the CDBG amount allocated in 2016 must be committed to the Near North Side Choice Neighborhoods footprint during the five-year grant cycle (approximately \$1.6 million over five years). The use of \$1,223,886.37 in unspent funds will allow the City to fund this worthwhile effort, without having to significantly reduce funding available for other programs.

In the event that the Near North Side neighborhood is not selected for the Choice Neighborhoods Implementation Grant, the City proposes to use unspent funds from prior years on the following:

- **Housing Production:** CDA proposes to use unspent funds during the Consolidated Plan period (2015 - 2019) to increase housing production in the proposed NRSAs. CDA provides funding to both non-profit and for-profit developers to renovate dilapidated/abandoned properties or develop vacant land with an emphasis on safe, decent, and affordable housing primarily for low- and moderate-income persons. This additional funding will be included in the 2017 Annual Action Plan.

Citizen Participation – Review of Draft Substantial Amendment and Public Hearing Notice (June 2016)

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 May 31, 2016. During the 30-day public comment period, from May 31, 2016 – June 30, 2016, 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 and public hearing notice was advertised in the St. Louis American and St. Louis Post Dispatch on June 2 and June 3, 2016, 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 and public hearing notice was posted on the CDA Facebook page.
- CDA emailed the draft 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 held a public hearing on June 16, 2016 at 5:00 p.m. at its office to review the draft Substantial Amendment and provide an opportunity for public comments. No comments were received on the substantial amendment.

Citizen Participation – Review of Draft Consolidated Plan Amendment and Public Hearing Notice (October, 2017):

CDA held a 30 day public comment period, from October 13 – November 13, 2017 on the draft Consolidated Plan amendment that included the changes made in the substantial amendment. The document 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 and public hearing notice was advertised in the St. Louis Post-Dispatch and St. Louis American on October 5 and 6, 2017, respectively.
- The public hearing notice was posted on the City of St. Louis public calendar (https://www.stlouis-mo.gov/events/eventdetails.cfm?Event_ID=15243).
- The draft Substantial Amendment was available for review at CDA and 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: <https://www.stlouis-mo.gov/government/departments/community-development/documents/amendment-to-2015-19-consolidated-plan-draft.cfm>.
- 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 held a public hearing on October 26, 2017 at 5:30 p.m. at its office to review the Draft Substantial Amendment and provide an opportunity for public comments. No comments were received on the Consolidated Plan amendment.