

City of St. Louis
Community Development Administration



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

July 8, 2020

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 **\$4,968,923**. 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 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
13-29-56	Land Clearance for Redevelopment Authority	LCRA Infrastructure	11,206.05
14-35-02	Community Development Administration	Housing Production	567,419.71
14-60-20	Building Division	Dr. Martin Luther King Pre-Development	400,000.00
15-32-02	Community Development Administration	Housing Production	388,205.04
16-32-02	Community Development Administration	Housing Production	637,459.00
16-50-03	St. Louis Development Corporation	Neighborhood Commercial District	502,436.85
17-35-02	Community Development Administration	Housing Production	54,880.00
17-50-03	St. Louis Development Corporation	Neighborhood Commercial District	253,741.82
17-90-02	Planning and Urban Design Agency	PDA Administration	83,971.95
18-10-35	Department of Parks, Recreation and Forestry	Operation Brightside	1,949.85
18-10-72	St. Louis Integrated Health Network	Trauma-Informed Justice System	17,293.00

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
18-11-67	St. Louis ArtWorks	St. Louis ArtWorks	1.72
18-35-02	Community Development Administration	Housing Production	1,854,151.07
18-90-02	Planning and Urban Design Agency	PDA Administration	341.05
19-10-04	Community Women Against Hardship	Public Services	4,426.98
19-10-35	Department of Parks, Recreation and Forestry	Operation Brightside	3,495.62
19-10-62	Urban League of Metropolitan St. Louis	Resident and Leadership Development I	13,708.39
19-10-63	City Counselor's Office	Problem Property Team Program	3,606.90
19-10-64	St. Louis City Courts	Problem Property Team Program	1,833.39
19-11-08	22 nd Judicial Court, Family Court-Juvenile Division	Innovative Concept Academy for At-Risk Youth	9,091.80
19-11-31	Herbert Hoover Boys & Girls Club	Out of School Youth Development Services	12,136.20
19-11-35	Guardian Angel Settlement Association	Childcare	5,240.47
19-11-61	Employment Connection	Competitive Employment Program	18,500.00
19-11-65	MERS Missouri Goodwill Industries	STL Youth Jobs	22,942.32
19-11-67	St. Louis ArtWorks	St. Louis ArtWorks	1,025.45
19-11-70	Urban League of Metropolitan St. Louis	Job Training	27,603.22
19-11-85	Department of Parks, Recreation and Forestry	Expanded Recreation	2,099.73

Contract No.	Operating Agency/Organization	Program/Activity Name	Unexpended Balance
19-11-93	Community Health In-Partnership	Youth Leadership Training Program	750.00
19-11-97	Better Family Life, Inc.	Neighborhood Alliance Model	43,185.39
19-12-40	St. Louis Area Agency on Aging	Elderly Services	2.66
19-12-84	Carondelet Community Betterment Services	CCBF Food & Nutritional Services	834.26
19-12-85	Guardian Angel Settlement Association	Food Pantry	702.60
19-12-95	Northside Youth & Senior Service Center	Northside Senior Meal Program	1,338.95
19-13-77	City Seniors, Inc.	Senior Services	170.00
19-14-11	Civil Rights Enforcement Agency	2018-2019 Fair Housing Assistance Program	2,718.94
19-14-23	Criminal Justice Ministry	Release to Rent-Reentry and Housing Services	1,478.48
19-14-61	Employment Connection	Reentry Services	4,500.00
19-36-23	Harambee Youth Training Corporation	Harambee Tuckpointing Youth Job Training	2,771.19
19-90-03	City Counselor's Office	Legal Support Services	6.23
19-90-01	St. Louis Development Corporation	Capacity Building for Minority Contractors	11,666.72
		Total	4,968,923.00

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 Virtual Public Hearing Notice (July 24, 2020)

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 8, 2020. During the 30-day public comment period, from July 8, 2020–August 10, 2020, the Draft Substantial Amendment will be made available for review 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 on July 9, 2020.
- 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 virtual public hearing to review the Draft Substantial Amendment and provide an opportunity for public comments:

Friday, July 24, 2020

Meeting Information

Citizens are invited to attend the virtual hearing via Zoom or by calling in.

When: Jul 24, 2020 01:30 PM Central Time

Topic: 2019 CDA Draft Substantial Amendment

To join the Zoom Meeting, go to: <https://us02web.zoom.us/j/87841834148>

One tap mobile

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Or Telephone:

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253 215 8782

Meeting ID: 878 4183 4148

Find your local number: <https://us02web.zoom.us/j/87841834148>