

City of Grants Pass
Community Development Block Grant (CDBG)
Minor Amendment to 2017-2018 (Year 3) Annual Action Plan



WHEREAS:

1. The City's 2015-2019 Consolidated Plan and Annual Action Plan for Year 1 was adopted by Resolution 15-6353 on August 5, 2015 and submitted to the US Department and of Housing and Urban Development (HUD). HUD issued an approval letter dated November 4, 2015. The 2015-2019 Consolidated Plan and Annual Action Plan for Year 2 was amended by Resolution 16-6459 dated August 3, 2016. Minor Amendments were made administratively on August 4, 2016 and August 8, 2016. HUD issued an approval letter dated September 21, 2016. The City's 2017-2018 Annual Action Plan was adopted by Resolution 17-6578 on August 2, 2017 and submitted to HUD. HUD issued an approval letter dated October 2, 2017. A Minor Amendment to reallocate funding was completed administratively on May 22, 2018 and approved by HUD on June 27, 2018. A Minor Amendment to correct program year was completed administratively on October 10, 2018 and approved by HUD on October 29, 2018.
2. The City's CDBG Citizen Participation Plan authorizes administrative Minor Amendments to the Consolidated Plan and Annual Action Plan as follows:

Minor Amendments

- i. **Definition.** A 'Minor Amendment' to the Consolidated Plan or Action Plan shall occur when total proposed amendment involves less than 10 percent (10%) of program year CDBG funding.
- ii. **Procedure.** Minor Amendments may be approved administratively by the City Manager. Minor Amendments do not require public notice or a (30)-day public comment period or City Council approval.

Each such Minor Amendment shall be incorporated into the Consolidated Plan through publishing in the next Action Plan and/or CAPER.


3. The City wishes to reallocate 10% of its Year 3 appropriation through a Minor Amendment. The City received a Year 3 appropriation of \$341,405. A Minor Amendment of 10% would not exceed \$29,619.
4. The Minor Amendment does not result in any significant changes in project purpose, scope, location, or beneficiaries.

THEREFORE:

1. Consistent with the Citizen Participation Plan: the 2017-2018 Annual Action Plan as adopted and amended, is hereby revised to include a Minor Amendment as described in Exhibit 'A.'
2. In accordance with the Citizen Participation Plan, the amendment will be addressed in the 2018-19 (Year 4) Annual Action Plan and/or Year 3 CAPER.



Aaron K. Cubic, City Manager



Date



MEMORANDUM

TO: Lora Glover, Director, Parks and Community Development

FROM: Anne Ingalls, Parks & Community Development Department

DATE: November 7, 2018

SUBJECT: CDBG Minor Amendments to Years' 1, 2, and 3 Annual Action Plans (AAP)

Recommendation

- ◆ Allocate CDBG funds to the following projects, including reallocation of approximately 10% of Years' 1, 2, and 3 funds (approximately \$27,506 from PY 1, \$10,069 from PY 2 and \$29,619 from PY 3 for a total amount of \$67,195) through a Minor Amendment to PYs' 1, 2 and 3. This will help close some gaps for projects ready to proceed, as well as move uncommitted funds from previous years to committed activities for PY 4. Those activities receiving a portion of the uncommitted funds are:
 - ✧ **Weatherization/Energy Efficiency.** Allocate approximately \$10,069 from uncommitted funds from PY 2 through a Minor Amendment. This is in addition to a \$45,000 allocation of PY 4 funds, for a total of \$55,069. UCAN has indicated there are projects ready to use this additional funding. This will help the City meet its obligation to use uncommitted funds for prior years. PY 2 will have no more uncommitted funds.
 - ✧ **Housing Rehabilitation (including ADA access, improvements).** Allocate approximately \$27,506 from uncommitted funds from PY 1 through a Minor Amendment. This is in addition to a \$48,000 allocation of PY 4 funds for a total of \$75,506. Several agencies have projects available for use of the additional funding. This will help the City meet its obligation to use uncommitted funds from prior years. PY 1 will have approximately \$110,855 remaining in uncommitted funds.
 - ✧ **Assist Site Acquisition and Improvements for Affordable Housing.** Allocate approximately \$29,619 from uncommitted funds from PY 3 through a Minor Amendment. This is in addition to a \$75,000 allocation of PY 4 funds, for a total of \$104,620. Several entities have expressed interest in preservation of low income subsidized housing, together with rehabilitation and improvements. This additional funding will help them achieve these activities. This will help the City meet its obligation to use uncommitted funds from prior years. PY 3 will have approximately \$94,739 remaining in uncommitted funds.

Summary

- ◆ The City is currently in Year 4 of the 5-year consolidate planning period. Program Year 4 began October 1, 2018 and is awaiting approval from HUD of the Year 4 AAP.
- ◆ With CDBG funds, sometimes we have known projects and activities that need funding. At other times, we allocate funds to housing related activities with the expectation that a project might

advance, but it is not always certain. Some activities allotted CDBG funding do not advance and therefore funds are not used and become uncommitted, carryover to the next year's activities. Some activities do not have the demand due to restrictions and they are not able to utilize all the allocated funds for that PY and those funds are carried over to future years. It is the uncommitted funds that require a plan as to how the City will utilize those funds going forward.

- ◆ In addition, the City has an obligation for "timely expenditure" of CDBG Funds. Reallocating some of the funds will assist projects which are ready to go and help the City meet its "timely expenditure" requirements. With these requirements, there is only so much we can roll over into future years when anticipated projects are not ready to proceed.
- ◆ As specified in the Citizen Participation Plan, the City can only reallocate up to 10% of the total annual funds to activities identified in the Consolidated Plan through a Minor Amendment, which can be approved administratively by the City Manager without the same extensive public process used for adoption of, and substantial amendments to, the Consolidated Plan and Annual Action Plan.
- ◆ Finally, we must use an initial estimate of \$275,000 per year for forecasting our CDBG funding appropriations. However, each year, the actual appropriation is announced and it varies. The Year 4 allocation was \$341,405 which allowed the City to allocate more funds to certain activities than originally planned.

Background

The above proposal was forwarded to our representative at HUD (Jason Triplett) on October 31, 2018. I had several conversations with him regarding the proposal to which he confirmed it all appears to meet the requested plan as to how the City plans to use the uncommitted funds, as well as addressing the corrections and revisions to the City's Year 4 AAP. The city will prepare the three Minor Amendments for Year 1, 2, and 3 AAPs in order to reallocate portions of those uncommitted funds to Year 4 activities. The amendments will be forwarded to HUD, together with the revisions and corrections to the City's Year 4 AAP, keeping in mind there is still remaining uncommitted funds in the approximate amount of \$132,400. This approximate amount has changed from the original amount (\$272,788) stated in HUD's disapproval letter of September 26, 2018, as more funding was appropriated in Year 3, leaving uncommitted funds in the amount of \$51,163 for Year 3 as opposed to the prior amount of \$124,358. The City will explain how it plans to utilize those funds in Year 5 through a Substantial Amendment early next year.

Upon HUD's review and approval of the Minor Amendments and the City's revised Year 4 AAP, the City can begin to allocate funds to those Year 4 activities ready to proceed.