

City of St. Louis  
Community Development Administration



Proposed Substantial Amendment  
2015 – 2019 Consolidated Plan  
2015 Annual Action Plan

July, 2015

## **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 and 2015 Annual Action 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 \$7,067,007.76. 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 a proposed change in activity, scope or funding that deviates significantly from the overall intent of the most recent Consolidated Plan. The proposed changes all meet 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:

Year	Contract#	Project/Activity Name	Unspent Funds
2013	13-31-72	Better Family Life CBDO	\$ 54,778.39
2010	10-29-95	BPS Neighborhood Capital Improvement	\$ 9,436.99
2011	11-29-95	BPS Neighborhood Capital Improvement	\$ 36,549.40
2009	09-36-31	Carondelet CBDO	\$ 17,954.59
2013	13-36-31	Carondelet CBDO	\$ 25,063.41
2013	13-14-12	Catholic Charities - Housing Resource Center	\$ 43,483.96
2009	09-90-00	CDA Administration	\$ 63,470.16
2012	12-90-00	CDA Administration	\$ 125,919.83
2013	13-90-00	CDA Administration	\$ 25,493.67
2012	12-32-01	CDA Rehabilitation Administration	\$ 858.65
2013	13-32-02	CDA Rehabilitation Administration	\$ 467,867.45
2013	13-31-65	Central Corridor CBDO	\$ 13,293.97
2014	14-90-03	City Counselor - Legal Services	\$ 1,734.79
2014	14-10-63	City Counselor - Problem Property Team	\$ 1,005.76
2012	12-90-03	City Counselor - Legal Services	\$ 531.97
2012	12-10-63	City Counselor - Problem Property Team	\$ 1,253.66
2013	13-10-63	City Counselor - Problem Property Team	\$ 223.18
2013	13-10-60	Community Education Centers - St. Louis Public School	\$ 6,408.14
2013	13-13-79	Community Health-In Partnership Services	\$ 100.00
2012	12-31-71	Community Renewal CBDO/MAP	\$ 125,294.84
2013	13-31-71	Community Renewal CBDO/MAP	\$ 4,430.76
2013	13-31-09	DeSales CBDO	\$ 2,150.50
2012	12-31-53	Dutchtown South CBDO	\$ 30,534.31
2013	13-31-53	Dutchtown South CBDO	\$ 91,371.38
2014	14-31-53	Dutchtown South CBDO	\$ 2,000.00
2008	08-11-85	Expanded Recreation	\$ 8,947.30
2009	09-11-85	Expanded Recreation	\$ 22,220.50
2010	10-11-85	Expanded Recreation	\$ 41,307.47

Year	Contract#	Project/Activity Name	Unspent Funds
2011	11-11-85	Expanded Recreation	\$ 45,697.15
2012	12-11-85	Expanded Recreation	\$ 33,130.35
2013	13-11-85	Expanded Recreation	\$ 47,047.77
2014	14-11-85	Expanded Recreation	\$ 18,845.47
2013	13-90-04	Federal Grants Administrative Support	\$ 11,382.14
2009	09-36-33	Grand Oak Hill CBDO	\$ 19,808.11
2013	13-31-33	Grand Oak Hill CBDO & MAP	\$ 38,684.91
2013	13-31-73	Greater Ville CBDO	\$ 36,105.29
2013	13-31-48	Hamilton Heights CBDO	\$ 22.98
2014	14-31-48	Hamilton Heights CBDO	\$ 4,055.00
2011	11-36-20	Healthy Home Repair	\$ 607.90
2012	12-36-20	Healthy Home Repair	\$ 465.40
2013	13-36-20	Healthy Home Repair	\$ 25,365.72
2014	14-36-20	Healthy Home Repair	\$ 43,575.11
2014	14-11-31	Herber Hoover Boys & Girls Club	\$ 5,340.19
2013	13-10-55	Hi-Pointe Center	\$ 113.36
2014	14-10-55	Hi-Pointe Center	\$ 71.28
2014	14-36-22	Home Repair - Home Services	\$ 14,388.44
2012	12-11-08	Innovative Concept School	\$ 1,292.32
2014	14-11-08	Innovative Concept School	\$ 9,159.21
2013	13-90-05	Internal Audit	\$ 23,058.01
2014	14-21-41	Metro Senior Citizen's Bathroom Rehabilitation	\$ 23,500.00
2014	14-12-41	Metro Senior Citizen's Transportation	\$ 1,245.40
2009	09-36-21	Minor Home Repair - Home Services	\$ 48,012.37
2014	14-36-21	Minor Home Repair - Home Services	\$ 51,532.77
2013	13-10-64	Municipal Court - Problem Property Team	\$ 18.97
2014	14-10-64	Municipal Court - Problem Property Team	\$ 3,753.79
2013	13-50-03	Neighborhood Commercial District	\$ 2,121,328.52

Year	Contract#	Project/Activity Name	Unspent Funds
2014	14-50-03	Neighborhood Commercial District	\$ 209,759.59
2014	14-31-54	North Newstead Association	\$ 500.00
2013	13-31-54	North Newstead CBDO	\$ 1,885.87
2014	14-11-31	Northside Community After School	\$ 0.73
2014	14-31-52	Old North St Louis	\$ 500.00
2013	13-10-35	Operation Brightside	\$ 5,591.67
2014	14-10-35	Operation Brightside	\$ 798.36
2014	14-11-62	Park Central Development Corporation	\$ 44,668.00
2012	12-90-02	PDA Administration	\$ 2,203.95
2013	13-90-02	PDA Administration	\$ 23,129.87
2014	14-90-02	PDA Administration	\$ 5,400.85
2012	12-10-65	Public Safety - Problem Property Team	\$ 2,712.75
2013	13-10-65	Public Safety - Problem Property Team	\$ 2,370.06
2014	14-10-65	Public Safety - Problem Property Team	\$ 7,567.50
2013	13-31-55	Riverview CBDO	\$ 14,064.91
2013	13-36-55	Riverview-West Florissant Home Repair	\$ 4,363.16
2013	13-10-07	SAGE	\$ 9,179.23
2010	10-36-21	Senior Home Security	\$ 61,301.70
2011	11-36-21	Senior Home Security	\$ 14,620.02
2012	12-36-21	Senior Home Security	\$ 65,315.75
2013	13-36-21	Senior Home Security	\$ 117,316.96
2013	13-31-24	Shaw Neighborhood Housing Corporation	\$ 492.28
2014	14-31-24	Shaw Neighborhood Housing Corporation	\$ 5,000.00
2014	14-31-40	Skinker-DeBaliviere Community Council	\$ 1,480.59
2012	12-50-06	LDC Business Development Support	\$ 1,361,633.00
2013	13-50-06	LDC Business Development Support	\$ 55,870.88
2013	13-90-90	SLDC Economic Development	\$ 78.37
2013	13-70-35	SLDC Property Board-Up/Maintenance	\$ 64,946.22

Year	Contract#	Project/Activity Name	Unspent Funds
2013	13-70-35	SLDC Property Board-Up/Maintenance	\$ 3,348.12
2014	14-70-35	SLDC Property Board-Up/Maintenance	\$ 2,528.81
2013	13-31-30	Southwest Garden CBDO	\$ 468.81
2014	14-31-66	St. Louis Community Empowerment Foundation	\$ 60,000.00
2014	14-90-60	St. Louis Community Empowerment/Minority Contractors	\$ 115,695.65
2013	13-10-82	St. Louis Tax Assistance Program	\$ 558.00
2012	12-31-78	Third Ward Housing CBDO	\$ 121,202.32
2013	13-31-74	UJAMAA CBDO	\$ 64,392.40
2009	09-21-93	UJAMAA Community Center	\$ 670,931.49
2012	12-36-66	Vashon Jeff-Vander-Lou CBDO	\$ 36,570.37
2013	13-36-66	Vashon Jeff-Vander-Lou CBDO	\$ 57,119.26
2013	13-10-04	Women Against Hardship	\$ 147.30
			<b>\$ 7,067,007.76</b>

Funding Reprogramming Destination

The City of St. Louis continues to be committed to the priorities set forth in its 2014 – 2019 Consolidated Plan. As such, the City proposes to use the unspent funds from prior years on the following:

1. Children’s and Adolescent Behavioral Health Center: In 2015, the Betty Jean Kerr’s People’s Health Centers (PHC) submitted a CDBG proposal to CDA for the construction of a new \$4.8 million, 20,000 square foot masonry Children’s and Adolescent Behavioral Health Center at 5647 Delmar Blvd., in the West End area. Proposed services will be provided on an outpatient basis and will include, among other things psychiatric diagnosis, consultation, behavioral management and individual, family and group therapy. Targeted population to be served at the Center will originate from the five most reported city zip codes for child abuse and neglect: 63112, 63118, 63115, 63120, and 63107. PHC requested \$3,000,000 and received an initial CDBG allocation of \$1,000,000. This substantial amendment proposes to fully fund PHC’s 2015 request by increasing its current allocation by \$2,000,000.
2. Emergency Shelter Rehabilitation: In 2016, CDA proposes to use \$500,000 of unspent funds to assist the City’s Department of Human Services’ Emergency Shelter Program in the rehabilitation and improvement of a proposed emergency shelter. The primary purpose of emergency shelters is to equip homeless persons to move into appropriate

forms of permanent housing as soon as possible. In addition to being provided with emergency shelter, essential services such as case management, employment assistance and job training, and transportation may also be provided. Location of the emergency shelter will be confirmed and reflected in the draft 2016 Annual Action Plan, which will be issued for public comment.

3. Recreation Center Improvements: In 2016, CDA proposes to use \$500,000 of unspent funds to assist the City's Department of Parks, Recreation, and Forestry in repairs to Wohl and 12<sup>th</sup> & Park Recreation Centers. Both recreation centers are located in low- and moderate neighborhoods and operate the CDBG-funded Expanded Recreation Services Program. This program is targeted to low to moderate-income children and provides after school and summer programs, providing a safe and fun environment for children during a time when they are most susceptible to crime.
4. Housing Production: CDA proposes to use \$2,000,000 of unspent funds during the Consolidated Plan period (2015 - 2019) to increase housing production. 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 allocated during annual CDBG funding cycles and will be presented in subsequent Annual Action Plans.
5. Home Repair: CDA proposes to use \$2,000,000 of unspent funds during the Consolidated Plan period (2015 – 2019) to increase the availability of home repairs. CDA's home repair program provides home repair assistance to low and moderate income homeowners in the City of St. Louis. This additional funding will be allocated during annual CDBG funding cycles and will be presented in subsequent Annual Action Plans.
6. Public Improvements: CDA proposes to use the remaining \$67,007.76 during the Consolidated Plan period (2015 – 2019) on CDBG-eligible public facilities and improvements. The additional funding will be allocated during annual CDBG funding cycles and will be presented in subsequent Annual Action Plans

## **Citizen Participation**

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 June 4, 2015. During the 30-day public comment period from June 4, 2015 – July 5, 2015, 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). The Draft Substantial Amendment was also available at the Central Branch of the St. Louis Public Library, which is located at 1301 Olive Street (63103), and on the CDA website: <http://www.stlouis-mo.gov/cda>. CDA held a

public hearing on June 18, 2015 at 5:30 p.m. at its office to review the Draft Substantial Amendment and provide an opportunity for public comments.

A copy of the public hearing notice will be presented in the Final Substantial Amendment as Exhibit 1. A summary of citizen comments received in writing and at the public hearing and responses to these comments will be presented in the Final Substantial Amendment as Exhibit 2.