



**SALT LAKE CITY
SUBSTANTIAL AMENDMENTS TO
2020-2024 CONSOLIDATED PLAN
2020-2024 CITIZEN PARTICIPATION PLAN
2020-2021 ACTION PLAN**

MAYOR
ERIN MENDENHALL

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Prepared by

S A L T L A K E C I T Y
HOUSING and NEIGHBORHOOD DEVELOPMENT DIVISION
COMMUNITY and NEIGHBORHOODS DEPARTMENT

September 10, 2020

PY 2020 Salt Lake City CARES Act Substantial Amendment

TO ADD

**COMMUNITY DEVELOPMENT BLOCK GRANT-CORONAVIRUS (CDBG-CV)
EMERGENCY SOLUTIONS GRANT-CORONAVIRUS (ESG-CV)
HOUSING OPPORTUNITIES FOR PEOPLE WITH AIDS/HIV-CORONAVIRUS
(HOPWA-CV)**

SUMMARY

Substantial Amendments to the 2020-2024 Consolidated Plan, 2020-2024 Citizen Participation Plan, and 2020-2021 Annual Action Plan for utilization of CARES HUD-CV funds for coronavirus response and recovery.

The requested amendments will allow the award of U.S. Department of Housing and Urban Development (HUD) Coronavirus Aid, Relief, and Economic Securities Act (CARES Act) funding to Salt Lake City, a total of **\$7,138,203** for coronavirus (CV) response and recovery. These funds will be used by Salt Lake City for eligible activities and services in accordance with Community Development Block Grant (CDBG-CV), Emergency Solutions Grant (ESG-CV) and Housing Opportunities for People With AIDS/HIV (HOPWA-CV) HUD regulations and CARES Act waivers.

CARES HUD-CV1 funds were allocated to Salt Lake City on April 2, 2020 via notification from HUD Acting Assistant Secretary for Community Planning and Development. On June 9, 2020, Salt Lake City was notified of an additional allocation of ESG-CV2 funds. On September 11, 2020, Salt Lake City was notified of an additional allocation of CDBG-CV3 funds.

- **Community Development Block Grant (CDBG-CV), first round \$2,064,298, third round \$999,551**
- **Emergency Solutions Grant (ESG-CV), first round \$1,040,462 and second round \$2,946,449**
- **Housing Opportunities for People With AIDS/HIV (HOPWA-CV), first round \$87,443**

Housing and Neighborhood Development (HAND) staff will administer the CARES HUD-CV funds. HAND staff will communicate with the Administration and City Council about the CARES HUD-CV allocation process.

CARES HUD-CV FUNDING

On March 27, 2020, the United States Congress passed The Coronavirus Aid, Relief and Economic Security Act (CARES Act) (H.R. 748, Public Law 116-136), which makes available \$5 billion in supplemental Community Development Block Grant (CDBG-CV) funding, \$1 billion for Emergency Solutions Grants (ESG-CV) and \$53.7 million for Housing Opportunities for Persons With AIDS (HOPWA-CV) grants to prevent, prepare for, and respond to coronavirus.

The CARES Act stipulated that HUD-CV funding must not fund duplicative activities and requires tracking to ensure no other funding source could be utilized for the expense. Grantees may use HUD-CV funds for a range of activities to prevent, prepare for, and respond to coronavirus. Funds must serve low- to moderate-income individuals or households, underserved communities or populations, and align with HUD National Objectives.

PROGRAM YEAR (PY) 2020 SUBSTANTIAL AMENDMENT

Due to the City's allocated CARES HUD-CV funding Substantial Amendments to the City's most recently adopted 2020-2024 Consolidated Plan, 2020-2024 Citizen Participation Plan, and 2020-2021 Annual Action Plan are required.

These Substantial Amendments has been prepared with the guidance from HUD that has been issued to date.

HUD REQUIREMENTS

HUD's Substantial Amendment Section 24 CFR 91.505 (b), outlines the criteria for Substantial Amendment and states "the jurisdiction shall identify in its Citizen Participation Plan the criteria it will use for determining what constitutes a Substantial Amendment. It is these Substantial Amendments that are subject to a citizen participation process, in accordance with the jurisdiction's citizen participation plan."

SALT LAKE CITY 2020-2024 CONSOLIDATED PLAN REQUIREMENTS

Salt Lake City's Consolidated Plan for 2020-2024 Citizen Participation Plan defines a Substantial Amendment as:

1. A proposed use of funds that does not address a goal or underlying strategy identified in the governing Consolidated Plan or Annual Action Plan; or
2. Increasing funding levels for a given project by 100% or more of the previously adopted amount; or
3. Decreasing funding levels for a given project by 100% AND pivoting impacted funds to another approved use during an action plan period; or
4. A change to a regulatory requirement or additional allocated funding from the US Department of Housing & Urban Development that defines that a Substantial Amendment must be completed.

Substantial Amendment to 2020-2024 Consolidated Plan:

#1 Accept Additional Allocations of Funding

Section SP-35, The Strategic Plan, Anticipated Resources. HUD 24 CFR 91.215 (a)(4), 91.220 (c)(1,2). Located on page 146 of the 2020-2024 Consolidated Plan.

The CARES HUD-CV allocations represent an additional allocation of funding from HUD to Salt Lake City's 2020-2024 Consolidated Plan, thus requiring a Substantial Amendment.

(See the SP-35 Anticipated Resources Appendix)

The City's current 2020-2024 Consolidated Plan will be amended to reflect the additional funding and eligible uses of the grant funds.

Substantial Amendments to 2020-2024 Citizen Participation Plan (Appendix C of the 2020-2024 Consolidated Plan):

#1 Shortened Public Comment Period

Citizen Participation, HUD 24 CFR 91.105. Located on page 281 of the 2020-2024 Citizen Participation Plan (Appendix C of the 2020-2024 Consolidated Plan)

Substantial Amendments are required to follow the City's Citizen Participation Plan, as outlined in the Consolidated Plan for 2020-2024, which under normal circumstances, requires a public comment period for the Substantial Amendment of thirty (30) days. However, to quickly implement the funds and activities of the CARES HUD-CV, HUD has waived that requirement with amendment to the City's Citizen Participation Plan, reducing the public comment period to five (5) days. Further, HUD is allowing the Citizen Participation Plan and the Substantial Amendment to the 2020-2024 Consolidated Plan and 2020 Annual Action Plan to run concurrently.

Although the CARES Act has shortened the public comment period to five (5) days, Salt Lake City Ordinance requires a fourteen (14) days public comment period. Salt Lake City will utilize a fourteen (14) day public comment period for this Substantial Amendment.

The City's current 2020-2024 Citizen Participation Plan will be amended to reflect this change and accept a fourteen (14) day public comment period.

This Shortened Public Comment Period amendment only applies to the CARES HUD-CV allocation, and not to other funding allocated by HUD.

Substantial Amendment to 2020-2021 Annual Action Plan:

#1 Accept Additional Allocations of Funding

Section AP-15, Expected Resources. HUD 24 CFR 91.215 (a)(4), 91.220 (c)(1,2). Located on page 33 of the 2020-2021 Annual Action Plan.

A Substantial Amendment is required to accept the CARES HUD-CV. These funds represent an additional allocation of funding from HUD to Salt Lake City's 2020-2024 Consolidated Plan and 2020-2021 Annual Action Plan.

(See the AP-15 Expected Resources Appendix)

The City's current 2020-2021 Annual Action Plan will be amended to reflect the additional funding and eligible uses of grant funds.

PUBLIC PROCESS

The 2020-2024 Citizen Participation Plan (Appendix C of the 2020-2014 Consolidated Plan) specifies the policies and procedures that encourage participation by Salt Lake City residents in the planning, implementation, and ongoing evaluation of the City's Consolidated Plan as required by the U.S.

Department of Housing and Urban Development (HUD). The Citizen Participation Plan encourages participation from citizens in neighborhoods that receive significant federal funding and from citizens living throughout the City.

The public is invited to comment on the Substantial Amendments to the Consolidated Plan before adoption by City Council. Per the guidance outlined in Consolidated Plan announcements of a Substantial Amendment may be communicated by the following way(s):

1. Public Notice to HAND's comprehensive email/ mailing list; or
2. Press Release, released through the Mayor's Office; or
3. Details will be posted on Housing and Neighborhood Development's website; or
4. Additional outreach may include utilizing the Mayor's social media platforms and other applicable forms of electronic communication, meetings, training, and noticing.

In all areas, the City will look to include the use of electronic communication, meetings, training, noticing, outreach, etc. where appropriate provided it is clearly communicated for participation by the general public.

Electronic draft documents of Substantial Amendments will be made available for public review and comment. Where allowable, the City will follow the required noticing of fourteen (14) calendar days.

An electronic version of the Substantial Amendments to the Consolidated Plan will be posted on the City's official web site during the same period. Due to the current COVID Emergency Declaration for Salt Lake City issued by Mayor Mendenhall on March 10, 2020 and since extended to-date, Salt Lake City facilities may be closed and documents will need to be reviewed electronically and in accordance with City policy.

All comments made by the public will be reviewed and analyzed by Salt Lake City Council staff and Housing and Neighborhood Development staff. Comments may be incorporated into the final Substantial Amendments document. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the Substantial Amendments.

A copy of the Substantial Amendments will be available at www.slcc.gov/HAND.

Comments will be accepted from September 10 through September 23, 2020.

Prior to making decisions on the Substantial Amendments the Salt Lake City Council will consider and review all public comments.

Written comments may be submitted to the Council at Comments.Council@slcc.gov, or to the Housing and Neighborhood Development contact at Tony.Milner@slcc.gov. Additionally, messages may be left on the Council comment telephone number; 801-535-7654.

COORDINATION WITH COMMUNITY PARTNERS

Salt Lake City has worked closely with Salt Lake County, the State of Utah and other community partners to ensure funds are strategically targeted to reach our most vulnerable residents who are impacted by coronavirus and programs are not duplicative. Community Partners include:

- Other regional CARES HUD-CV grantees
- Salt Lake City CARES HUD-CV Internal Working Group

- Salt Lake City’s Resident Advisory Group, the Community Development and Capital Improvement Program Board
- HUD Regional Office
- HUD Technical Assistance Representative
- National homeless and affordable housing consultants and advocacy groups

HUD requires CV grantees to prevent the duplication of benefits, which means grant funds may not be used to pay costs if another source of financial assistance is available to pay that cost. HAND will work with selected community partners and track other funding and community benefits in order to prevent duplication of services.

CONTACT INFORMATION

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TO VIEW THE: 2020-2024 CONSOLIDATED PLAN, 2020-2024 CITIZEN PARTICIPATION PLAN, and 2020-2021 ANNUAL ACTION PLAN, please click on the following [link](#), or visit HAND’s main website page at www.slc.gov/HAND/.

APPENDICES:

- Substantial Amendments to SP-35 Anticipated Resources and AP-15 Expected Resources