

City of Niles



PY 2013

(October 1, 2013– September 30, 2014) Community Development Block Grant Annual Action Plan

Originally Approved August 12, 2013

Including Approved First Substantial Amendment Approved April 14, 2014
Including Second Proposed Substantial Amendment

Sanya Phillips: CDBG Administrator
Juan E. Ganum: Community Development Director
City of Niles, MI
333 North 2nd Street
Niles, MI 49120
269.683.4700
sphillips@nilesmi.org
jganum@nilesmi.org
www.ci.niles.mi.us

ACTION PLAN – 91.200 and 91.220(b)- Citizen Participation

The City of Niles approved Citizen **Participation Plan** requires that staff develop and notify the community at-large of the City's intention to amend the approved Annual Action Plan. Specifically, the **Participation Plan** states that a substantial amendment will be undertaken in the following circumstances:

- Addition of a new activity or project not previously described in its Consolidated or Action Plan;
- Deletion of an activity or project previously described in its Consolidated or Action Plan;
- A change in the purpose, scope, location, or beneficiaries an activity or project previously described in its Consolidated or Action Plan;
- Change in the use of CDBG funds from one eligible activity or project to another previously described in its Consolidated or Action Plan;
- Change in an activity or project (previously described in its Consolidated or Action Plan) total dollar amount allocated or budgeted by more than 15 percent

The Citizen Participation Plan requires the following Public Notice and Publication Requirements:

- In the case of a proposed substantial amendment the City will publish a public notice in a local newspaper with general circulation describing the project and the amount to be spent and establishing a 15 public comment period. The published public notice will set a date for a public hearing, which will occur at least 10 days prior to the City Council meeting at which the proposed substantial amendment will be slated for adoption.
- The notice will include a summary of the proposed plan and list the locations where copies of the substantial amendment may be examined. These locations include the office of the Niles City Clerk and the City's website, www.ci.niles.mi.us.

In accordance with the above requirements, Community Development staff prepared the following schedule for the second substantial amendment to PY 2013 Action Plan:

- **September 5, 2014**
Publish notice of intent to substantially amend annual action plan in the Niles Daily Star and post at City Hall on the public notice board.
- **September 22, 2014**
Public hearing to substantially amend annual action plan
- **October 13, 2014**
Approval of substantial amendment

The following Public Notice was submitted for publication in the Niles Daily Star on **September 5, 2014**

CITY OF NILES
NOTICE OF PUBLIC HEARING REGARDING
A SUBSTANTIAL AMENDMENT TO THE PROGRAM YEAR 2013 ANNUAL ACTION PLAN FOR THE CITY'S
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

A public hearing will be held on September 22, 2014 at 5:55 p.m., at the City of Niles Fire Department and Council Chambers, 1345 E Main Street, Niles, MI, to obtain the views of citizens concerning the approval of a substantial amendment to the City's 2013 and 2014 Community Development Block Grant Program Annual Action Plans.

An electronic version of the proposed substantial amendments to the 2013 and the 2014 Annual Action Plans may be viewed on the City's homepage at www.ci.niles.mi.us or a hard copy may be viewed at the first floor of City Hall, 333 N. 2nd Street, Niles, MI.

Below are the budgets proposed through the substantial amendments to the 2013 and the 2014 Annual Action Plans:

Program Year 2013 (October 1, 2013 – September 30, 2014)		
Priority	Project	Funding Level
1	Infrastructure- Road Resurfacing	\$110,919
2	Homeowner Assistance Program	\$48,000
3	Public Services	\$40,975
4	Code Enforcement	\$61,155
5	Administration	\$54,047
6	Chapin Mansion Window Restoration Project	\$158,171
Total		\$473,270

Program Year 2014 (October 1, 2014 – September 30, 2015)		
Priority	Project	Funding Level
1	Infrastructure- Sidewalks	\$75,000.00
2	Code Enforcement	\$50,000.00
3	Homeowner Assistance Program	\$75,000.00
4	Public Services	\$40,000.00
5	Administration	\$54,317.00
Total		\$294,317.00

PLEASE BE NOTIFIED that you are invited to attend the hearing and to present your opinions or position concerning the subject of this hearing. If you are unable to attend the hearing, you may send a letter stating your opinions or position to the City of Niles (Attn. CDBG Administrator), 333 N. 2nd Street, Niles, MI 49120, or email sphillips@nilesmi.org.

The City of Niles will provide necessary reasonable auxiliary aids and services to those individuals with disabilities who wish to attend its public meetings upon receiving at least three days notice. Any such individual requiring such aids or services should contact the City by writing or calling the following: City of Niles ADA Coordinator, 333 N. 2nd Street, Niles, MI, phone (269) 683-4700 or 683-1313 to access the TDD (a non-voice terminal device) for individuals with hearing or speech impairment.

DATED: [actual publication date]

Juan Ganum
Community Development Director

PROPOSED CHANGES TO THE PY13 ANNUAL ACTION PLAN

1. Goals

Updated Goals	Updated Activities
Public Safety and Support	<ul style="list-style-type: none"> Public Services to Low/Moderate Income Citizens
Arrest or Limit Neighborhood Decay	<ul style="list-style-type: none"> Code Enforcement Owner-Occupied Housing Assistance Emergency Rehabilitation/Repair Chapin Mansion Museum Renovation
Improve Public Infrastructure	<ul style="list-style-type: none"> Street Resurfacing
Administration	<ul style="list-style-type: none"> CDBG Program Administration Code Enforcement Software Upgrade (includes GIS mapping function)

2. AP-15 Expected Resources – 91.220(c) (1, 2)

The City of Niles will receive \$273,173 in CDBG funds for PY 2013 based on the information supplied to the City of Niles, MI by the US Department of Housing and Urban Development (HUD). Additionally, the City estimated \$40,000 in remaining funds from PY 2012 would be reprogrammed and used during the 2013 Program Year. However, during preparation of the PY 2012 CAPER the City determined an actual balance of \$231,083 in unexpended funds.

Unexpended project funds from the PY 2012 Chapin Mansion Window Restoration project were carried into PY 2013 and the first substantial amendment included an increase in project funding. Remaining funds were used to increase previously approved projects and allocated to demolition projects as originally proposed and approved as part of the PY 2013 Annual Action Plan. The City anticipates that it will carry forward an estimated \$31,469 in remaining funds into PY 2014.

3. Amended Table 1 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds		Expected Amount Available – PY 2013				
				Annual Allocation:	Program Income:	Prior Year Resources:	Total:	
CDBG	public - federal	Program Year 2013 (October 1, 2013 – September 30, 2014)						
		Priority	Project					Funding Level
		1	Infrastructure- Road Resurfacing					\$110,919
		2	Homeowner Assistance Program					\$48,000
		3	Public Services					\$40,975
		4	Code Enforcement					\$61,155
		5	Administration					\$54,047
		6	Chapin Mansion Window Restoration Project					\$158,171
Total		\$473,270	\$273,173	\$480	\$231,083	\$504,736		

4. Amended City of Niles, MI PY 2013 CDBG Project Budget

	Requested Budget
Infrastructure- Road Resurfacing	\$110,919
Homeowner Assistance Program	48,000
Public Services	40,975
Code Enforcement	61,155
Administration	54,047
Chapin Mansion Window Restoration Project	158,171
Totals	\$473,270

Amended Budget Notes

- Remaining PY12 funding available at beginning of PY13 funding cycle: \$231,083 (according to PY12 CDBG Financial Summary Report PR26 line 16 Unexpended Balance dated 8-20-14)
- PY13 Funding through HUD Grant B13 MC260042: \$273,173
- Chapin Mansion Window Restoration Project now amended for the second time, increasing total budget to \$158,171. Additional funding requested through this substantial amendment: \$45,000. See item 5 below
- Requests an increase in Program Administration funding to \$54,047 but remains under the Administration Cap (20% of total award) of \$54,634. These funds have been used for City Community Development Department (CDD) and Finance Department staff, legal expenses, printing and publishing, training, other allowable administration costs and software upgrades for use by the Code Enforcement Division.
- Adheres to the public service cap (15% of total award) of \$40,975.
- Eliminates Spot Blight/Slum Elimination funding. Structures originally slated for demolition with CDBG funds have been targeted for demolition by the Berrien County Land Bank program.
- Proposes to re-categorize the acquisition of code enforcement software as a program administration expense, as directed by HUD CPD representatives during their review of the PY 2014 Annual Action Plan.
- Increases funding to Code Enforcement to \$61,155 to support increased code enforcement efforts within the LMA.
- Imposes a moratorium on Homeowner Assistance Program spending through the beginning of the next program year (10/1/14) for staff to receive technical assistance from the Detroit HUD Field Office or appropriately procures and accepts bids/proposals/qualifications for project management and rehabilitation including lead work from a certified lead/general contractor. This is done in an effort to adhere to environmental review and procurement requirements associated with funding larger homeowner assistance rehabilitation projects.

Remaining funds will be allocated to HAP during the next funding cycle. See item 6 below for further information regarding requested program changes.

- Eliminates funding for consolidated planning and analysis of impediments to fair housing during this funding cycle as the City requested and received approval for a one-year extension on submission.
- Estimated remaining funds to carryover to PY14: \$31,469

5. Amended Chapin Mansion Window Restoration Expansion - funding increase: \$45,000

During initial planning for the Chapin Mansion Window Restoration Project scope included separately packaged bid items. Based on recommendations from the City's architectural contractor, Kil Architecture, projected costs associated with the installation of storm windows at the Chapin Mansion in conjunction with the active window restoration project, as previously proposed in association with the current project contractor's (Mihm Enterprises) bid package, were and lower than any other bids associated with the current project scope.

Kil Architecture and project contractor, Mihm Enterprises, presented concerns that without the installation of storm windows in tandem with the restored windows, that over time, the City will encounter similar deterioration of the windows and structural surrounding as environmental conditions are unavoidable. Together they believe that the installation of storm windows will reduce deterioration and increase the viability of the restored components long-term.

6. Amended Homeowner Assistance Program- estimated increased funding needed: \$0

At this time Community Development Department staff, in agreement with the Code Enforcement Division and Building Safety Division, seek to expand HAP funding limits so that homeowners are able to obtain larger loans to repair their homes. Advanced decay and household poverty continues to overtly tax the already constrained HAP and as such, program staff have recommended that increased grants/loans be provided to income qualified homeowners needing repairs in excess of the \$5,000 program cap. While it is understood that increasing the cap may trigger expanded environmental review and interim control requirements, the City has contracted a firm to conduct lead risk assessments and environmental review training and support to the City's HAP team. The firm has been educating City staff on environmental requirements.

City staff are recommending the following tiered *deferred and or forgivable program with zero interest loan format*:

Tier One: (\$5,000 and less) - Forgivable Loan Program- associated lien forgiven in it's entirety after 5 years.

Tier Two: (\$5,001 to \$24,999) Up to \$5,000 will be forgivable in accordance with Tier One standards and the remaining loan balance will be only captured upon sale of the home.

Based on these itemized changes to the PY13 Annual Action Plan, the City of Niles has formally initiated the Substantial Amendment Process through the update and posting of this document, the City of Niles, Michigan 2013 Annual Action Plan.

7. Amended AP-55 Affordable Housing – 91.220(g) Goals

One Year Goals for the Number of Households to be Supported

	Original Goal	Requested New Goals
Homeless	0	0
Non-Homeless	7	3
Special-Needs	1	1
Total	8	4

One Year Goals for the Number of Households Supported

	Original Goal	Requested New Goals
Rental Assistance	0	
The Production of New Units	0	
Rehab of Existing Units	8	4
Acquisition of Existing Units	0	
Total	8	4

END OF PROPOSED CHANGES TO THE PY13 ANNUAL ACTION PLAN

Remainder of Page Left Blank Intentionally

Project Updates:

AP-35 Projects – 91.220(d)

CDBG funded activities for the 2013 program year (October 1, 2013 - September 30, 2014) will meet underserved needs, improve housing, provide a suitable living environment and foster a higher quality of life. As identified within the 2009 - 2013 Consolidated Plan, a majority of planned activities will take place within the City's low and moderate income LMA Target Area, which is shown in section 91.220(d) of this Action Plan.

1. Road Improvement Project- Road Resurfacing

Residents have indicated that there are some basic infrastructure improvements that are critical to neighborhood safety and beautification. Community residents cited potholes, broken curbs, broken and damaged sidewalks, nonfunctional lighting, and other infrastructure and maintenance issues that need to be addressed to enhance the appearance of the neighborhood and help restore hometown pride. While the City already focuses on more mundane issues such as street light replacement, this project seeks to continue the previous infrastructure improvements that will benefit residents by creating sustainable neighborhoods. Repairing sidewalks is a high priority activity as identified by the 2009 *Community Needs Assessment Survey*.

Outcome: In **PY 2013** the City will allocate \$110,000 to improve road condition within its LMA. Project locations will be selected by the Department of Public Works based on road condition, vehicular traffic and mobilization efficiency. Total quantities of improved roadwork will depend on unit cost obtained during the spring of 2014, however, at current market rates, it is estimated that the City will be able to resurface streets 2570 linear feet of its local roadways.

Update: Final costs associated with this project were \$110,919.81. A detailed explanation of project will be included in the PY13 CAPER due December 30, 2014.

2. Homeowner Assistance Program (HAP).

While housing remains generally affordable in Niles, poor housing quality, lack of equity and poor credit are negatively impacting prospective low and moderate income home buyers and existing homeowners. To address housing quality the City of Niles established a CDBG-funded Homeowner Assistance Program in 2004. The program works by providing rehabilitation assistance for income eligible homeowners (similar to a program which was funded by the Michigan State Housing Development Authority in Niles in 1995). The HAP addresses single items within a home (e.g. roof, furnace, electrical systems, etc.). Previous versions of the program addressed multiple items within a single home. The 2014 HAP seeks to assist homeowners by utilizing funds to repair/replace their most critical needs.

Outcome: In **PY 2013**, the City proposes to fund the HAP at \$60,000 and make emergency repairs to a minimum of four (4) homes owned by City of Niles low/moderate income homeowners in accordance with the City of Niles Homeowner Assistance Program Guidelines,

all HUD rehabilitation regulations and rules, including LPD regulations and current income guidelines for our community.

Update: Effective immediately, the City will place a moratorium on program enrollment. **Please see substantial amendment outline for further details.** It is expected that in program year 2014 the City will expand the program so that homeowners are able to obtain larger loans to repair their homes. Advanced decay and household poverty has been furthering the already constrained HAP and as such, program staff have recommended that increased grants/loans be provided to income qualified homeowners needing repairs in excess of the \$5,000 program cap. While it is understood that increasing the cap will trigger expanded environmental review and interim control requirements, the City has contracted a firm to conduct lead risk assessments and environmental review training and support to the City's HAP team. The firm has been educating City staff on environmental requirements. The City now has a lead based paint provision in every contract and/or agreement in which CDBG dollars are used to fund any project and the following Lead Based Paint Certification with this Annual Action Plan:

***Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;*

The Homeowner Assistance Program is a *deferred and or forgivable program with zero interest loan terms*. There are two tiers of support:

Tier One: (\$5,000 and less) - Forgivable Loan Program

Tier Two: (\$5,001 to \$24,999) Up to \$5,000 will be forgivable and the remaining loan balance will be only captured upon sale of the home.

In order to avoid full repayment all homeowners, regardless of the loan tier, must reside in their home for at least five years. Those clients receiving a \$0 - \$5,000 loan can expect their loans to be forgiven their entirety and the mortgage to be discharged. Those clients receiving a \$5,001+ loan can expect that after five years \$5,000 of the loan is forgiven in its entirety and the remaining loan will only become due upon the sale of the home. The deferred and forgivable aspect of this program is an excellent incentive to low-income homeowners who lack the financial means of making physical improvements to their homes. The HAP will be available throughout the entire City of Niles, but only to those households whose low and moderate income status is verified. In deploying the HAP the City has turned to a variety of administrators over the years, with varying degrees of success. The City now administers the HAP program internally.

3. Public Services- Ferry Street School Neighborhood Resource Center.

Opened in June of 2005, the Resource Center is providing an invaluable service to the Ferry Street neighborhood and the community at large. Ferry Street has been referred to as an "advocacy and enrichment center" with a mission that involves "empowering residents and restoring pride". The renovated historic building is indeed functioning as a resource center by housing neighborhood advocacy activities and providing a home base for a number of organizational events within the Target Area. Most importantly, the Resource Center has

developed into a one-stop referral center for residents that would not normally seek information or assistance. The Center is an important focal point for residents that view it as a preferred alternative to dealing with City Hall.

Among the programs that are being coordinated by or offered through the Center:

Job Training and Placement

Working directly with area employers
 Connecting unemployed with job opportunities
 Mock interviews
 Resume workshop
 Skills assessment

Adult (16+)
 Teeny Bop (4 & 5)
 Tutoring program - fills in gap for all ages (work with Mt. Cavalry Baptist Church)
 Develop love of reading and strengthen language skills

Rite of Passage Program

Established national program
 Girls (Daughters of Imani) and boys (Young Lions)
 10 - 20 year olds
 Training program to help adolescents transition to adulthood
 Teach respect, responsibility, integrity and build character

Dance Team

Girls
 March, stomp, dance
 Helps challenged youth

Girl Scout Group

Recreational Basketball League
 3 age groups 11-13, 14-17, 18+

Basic Computer Training

Bridges to Excellence program

Literacy program

In PY 2013, the director will continue to oversee the development and operation of the Resource Center. Working with her board of directors and the City of Niles, the director will also seek to expand and strengthen the public service programs that are currently offered. The organizational structure of the Center changed dramatically in 2008 when a board of directors was formed and the Center obtained 501(c)(3) tax exempt status. Since then, the Resource Center has been successful in obtaining other grant revenues, but remains a key component of the City's CDBG strategy.

Outcome: In PY 2013 programming is likely to evolve with the changing needs and desires of Center customers. Because the Resource Center constitutes the only public service program in the City's PY 2013 CDBG budget, a maximum of \$40,000 (~15% of \$273,173) has been allocated per Title 42, Section 5305(a)(8). It is estimated that the Resource Center will provide support to the following activities to 375 unduplicated low/moderate income City of Niles residents:

Activity:	# Unduplicated Individuals /Month	# Unduplicated Individuals /Year	# Unduplicated Families /Month	# Unduplicated Families /Year
Assistance with DHS functions	7	84	25	300
Computer Lab academic/work programs	15	180	20	240
Meeting place	0	0	2	24
Assistance with the needs of the homeless and	4	48	6	72
Mentoring young people to reduce crime/drugs	1	12	3	36

Update: This substantial amendment proposes to adhere to the Public Services Cap (15% of total award) of \$40,975.95 by reducing the public services allocation to FSRC by \$636.97 for the year but maintains Administration allocation to FSRC in the amount of \$3,000 for subcontracted financial oversight as previously approved by CPD Representative Marguerite Sykes.

4. Code Enforcement- CDBG funds may be used for code enforcement only in deteriorating or deteriorated areas where such enforcement, together with public or private improvements, rehabilitation, or services to be provided, may be expected to arrest the decline of the area. (Reference: §570.202(c)). The City will fund its Code Enforcement Division of its Fire Department to eliminate and reduce blighted conditions. Current Code Enforcement software used to input and track all properties in Niles is in need of updates and upgrades. The City intends to use a portion of Code Enforcement funding to purchase updated BS&A software that includes GIS mapping/reporting functionality including LMA overlays.

Original Outcome: In PY13, the City of Niles intends to allocate \$49,173 for code enforcement activities throughout the City's LMAs and the purchase of the updated BS&A software. Below is a representative example of the current code enforcement activities throughout the City. Each blue dot represents specific instances of code enforcement activities. This map, created utilizing third party GIS vendor, would be available inherently within the updated software, allowing for regular review of code efforts, decay/enforcement patterns and other helpful guides that will allow the City to more effectively and efficiently respond to the maintenance of a suitable and sustainable living environment.

Update: This substantial amendment proposes to move the BS&A software upgrade to Administration as suggested by HUD CPD Representatives during HUD review of the PY14 Annual Action Plan which included the PY13 carried through BS&A software upgrade project as it was expected that needed upgrades to City servers funded outside of and not contingent on the CDBG program would not be available until after the end of the CDBG program year (PY13). During the time when the City's PY14 Annual Action Plan was under review by HUD and prior to receiving word from HUD that the BS&A project was incorrectly classified, non-CDBG funding became available to fund the City's server project and in an effort to meet goals associated with the PY13 Annual Action Plan originally requested and approved by HUD City CDD staff presented the upgrade proposal to the City Council for approval as an eligible expense under the City's CDBG funded Code Enforcement project. Because of the crossover timing in Council's approval of the upgrade proposal and HUD's guidance on BS&A project eligibility/categorization as part of the PY14 Annual Action Plan process, City CDD staff have agreed to prepare a substantial amendment to the PY14 Annual Action Plan after October 1, 2014 and remove the BS&A software upgrade from the PY Annual Action Plan completely and reallocate funds to other approved projects. Additionally, this substantial amendment proposes to increase funding to Code Enforcement by funding to \$61,155.56 to support increased code enforcement efforts within the LMA as evidenced by reports on current year code enforcement efforts. To date over 1,000 City residences have received notices of code violation needing rectified. Officer hours have increased and a part time office support position has been added based on the increased needs.

5. Program Administration.

This project funds CDBG program administration activities. The City employs part-time CDBG Administrator using CDBG Program Administration funding to manage program operations, including public noticing and project monitoring, funding requests and reviews, data entry, project closeout reports and procedures, technical assistance to applicants and to subrecipients, and Citizen input facilitation, as well as the preparation and oversight of all CDBG program reporting to the Niles City Council, to the citizens of Niles, and to HUD.

Original Outcome: In accordance with HUD CDBG regulations regarding Administrative expense caps the City will allocate 18% of the entire allocation, or a total of \$49,000 for the general administration of the City's CDBG program. Up to \$5,000 of the total Administration line will be specifically set aside to conduct the Analysis to Impediments to Fair Housing. The City will conduct an RFQ for the AI, targeting university professors specializing in a related field.

Update: This Substantial Amendment requests an increase in Administration funding to \$54,047.61 but remains under the Administration Cap (20% of total award) of \$54,634.60. It also provides for the elimination funding for consolidated planning and analysis of impediments to fair housing during this funding cycle as the City requested and received approval for a one-year extension on submission. Administration funds have been used for City CDD and Finance Staff; recruitment, legal and other newspaper advertisements; training, other allowable administration costs and the BS&A software upgrade.

6. Public Facilities: Chapin Mansion Window Restoration Project.

The City of Niles 2009 - 2013 Consolidated Plan includes priority needs to "provide adequate recreation and leisure opportunities for citizens" and "preserve the historic character of the community". These needs are mutually compatible as they enhance and improve quality of life in Niles. This project aims to begin the restoration of City Hall at 508 East Main Street once the building is vacated for the purpose of developing a house museum. The purpose of the house museum is to showcase a slice of Niles's unique history. Low and moderate income residents would not be charged an entrance fee. This project began during PY12 and funding was carried through to PY13.

During CAPER reporting in December, 2013 the City submitted the following outcomes information: "During this program year the City solicited RFQs from local architects to oversee the renovation of the windows at the historic Chapin Mansion. Based on costs and qualifications, Kil Architecture was selected. To date, Kil has prepared and submitted a workplan in which one of the initial steps was to solicit estimates for and execute the environmental review for the project. Based on the outcome of the environmental review the Notice of Intent to Request Release of Funds has just been finalized and submitted to HUD for approval (December 7, 2013). This project is making slow, careful progress and will be carried over into PY13.

Due to the complexities of the environmental review and historic preservation regulations, renovation of windows at the historic Chapin Mansion Museum has been slow. Because the contracted architect has made continuous progress throughout the summer and fall, this project will be carried forward into the new program year and is estimated for completion in August 2014.”

Additional funding was requested as part of the City’s request and approval for Substantial Amendment in March, 2014 the information provided and approved was as follows: “On August 13, 2012, the City Council approved the Program Year 2012 CDBG Action Plan, which describes various goals and activities for the City’s CDBG program. Among the CDBG-funded projects listed in the PY2012 Action Plan is a \$100,000 project to restore the windows at the former Niles City Hall at 508 East Main Street, Niles, MI (current Chapin Mansion – Niles History Center). This project was extended into the Program Year 2013 CDBG Program Year that began on October 1, 2013.

The City solicited bids for the project on February 21, 2014. To perform work that is critical to properly maintain the Chapin Mansion, which includes repair of all the clear glass windows and restoration/repair of six art glass sections, an additional \$27,671 will be required. The City is proposing a substantial amendment of its PY 2013 CDBG Action Plan by transferring \$27,671 programmed for slum and blight removal, to the Chapin Mansion project.”

At the time, the Mansion project had \$85,700 in remaining funding from the PY12 Annual Action Plan and requested an additional \$27,471 in funding to support outlined restoration efforts for a project total of \$113,171.

On Monday March 24, 2014 during the regularly scheduled City Council meeting, the Community Development Director recommended that the City Council approve an amendment to the PY 2013 CDBG Action Plan to increase the Chapin Mansion Museum Restoration budget and perform work that is critical to properly maintain the Chapin Mansion, which includes repair of all the clear glass windows and restoration/repair of six art glass sections.

1st Substantial Amendment Public Notice, Public Meeting and Public Comment Period Timeline

Monday, March 24, 2014:

Request and schedule public meeting to approve substantial amendment to the annual action plan

Wednesday, March 26, 2014:

Publish notice of intent to substantially amend annual action plan in the Niles Daily Star and post at City Hall on the public notice board for a minimum of 10 days (posting removed on or after April 9, 2014)

Monday, April 14, 2014:

Public hearing, (2) approval of substantial amendment by Council, (3) approval of bid award/contract by Council

Update: At the beginning of August, 2014, CDD staff asked the City Council to consider a 2nd Substantial Amendment to the PY13 Annual Action Plan that would among other requests, increase funding to the Chapin Mansion Project by \$45,000. The City initiated the formal Citizen

Participation Plan and provided the City Council with a staff report on the requested redistribution of funds and at the time of the preparation of this substantial amendment (August 20, 2014), the City was in the middle of the public comment period. Based on information garnered upon HUD review of the PY14 Annual Action plan, City CDD staff decided that rather than carry forward with the requested Substantial Amendment dated August 11, 2014 that a revised 2nd Substantial Amendment would be drafted and provided to the City Council and posted for public comment.

NO FURTHER CHANGES MADE TO ORIGINAL AND/OR SUBSTANTIALLY AMENDED PROGRAM YEAR 2013 ANNUAL ACTION PLAN