

City of Meriden
Substantial Amendment
December 2011

Summary

On December 19, 2011, the Meriden City Council voted to approve the reallocation of \$504,404.60 of CDBG Program Years 31 through 37 funds from completed or canceled activities to other eligible CDBG activities. A complete list of each program year, activity and funding reallocation is included on Attachment A, 2011 Reprogrammed Funds. All of the activities that received funds in the reallocation are consistent with the City's 2010-2015 Consolidated Plan for Housing and Community Development and will benefit Meriden's low- and moderate-income residents.

Annual Plans for CDBG Program Years 2005, 2006, 2007, 2008, 2009, 2010, and 2011 are hereby amended and the following activities will be implemented with the funds reprogrammed:

Public Facility Activity

Reprogrammed funds from Program Year 2006 funding for NPP Loans in the amount of \$14,418.93, Program Year 2007 funding for the Mobile Work Crew in the amount of \$2,485.22, Program Year 2008 funding for NPP Loans in the amount of \$18,820, Program Year 2009 funding for the Section 108 Loan, Arts throughout the City, Christmas in Action, Beat the Street, Mobile Work Crew, Meriden Kids Walk Safe in the total amount of \$17,774.54, Program Year 2010 funding for the Mobile Work Crew, Community Health Center Nurturing Families, and Housing Legal Services in the total amount of \$1,484.31 will be allocated to this activity. Total reprogrammed funds allocated to the Inner-City Sidewalks is \$147,376.73. The activity will fund replacement of sidewalks in low-income areas of the City. The environmental record review for these program years will be updated upon selection of project sites.

Meriden Housing Authority (MHA) Security Cameras

Program Year 2005 funding for MHA Downpayment Assistance in the amount of \$40,500 and Program Year 2006 funding for NPP loans in the amount of \$16,000 will be allocated to this activity. Total reprogrammed funds allocated to the MHA Security Cameras activity is \$56,500. The activity will fund the replacement of the security system at the Meriden Housing Authority's Community Towers housing development. The environmental record review for these program years will be updated upon completion.

Rehab Administration

Program Year 2006 funding for NPP Loans in the amount of \$23,000 and Program Year 2011 funding for Code Enforcement in the amount of \$39,177.87 will be allocated to this activity. Total reprogrammed funds allocated to Rehab Administration is \$62,177.87.

Code Enforcement 2011

Program Year 2006 funding for NPP Loans in the amount of \$23,000 and Program Year 2008 funding for NPP Loans in the amount of \$100,000 will be allocated to this activity. Total reprogrammed funds allocated to Code Enforcement 2011 is \$123,000.

Applicable rules and regulations

This Amendment approved on December 19, 2011 will be included as a permanent attachment for the Program Years 2006, 2007, 2008, 2009, 2010, and 2011 Annual Plans. A copy of the amendment will be submitted to HUD with the CDBG Program Year 2011 Consolidated Annual Performance Evaluation Report (CAPER).

Summary of Public Input

The Grants Administrator reviewed existing programs and compliance with the Comprehensive Plan. Funds originally allocated to the MHA were reallocated to meet a critical facility improvement at one of its developments. Prior year NPP Loan Program housing rehabilitation funding was allocated to sidewalk improvements in low-income areas. Additional funds were allocated to Program Year 2011 to correctly classify staff salaries allocated to Code Enforcement, NPP Rehab Program Administration, and General Program Administration.

On November 21, 2011, the Grants Administrator submitted a recommendation to the Meriden City Council to reallocate \$506,654.60 in CDBG funds from Program Years 31 through 37 to the following activities: Inner-City Sidewalks \$149, 626.73, Factory H Demolition Contingency \$90,000, MHA Security Cameras \$56,500, Rehabilitation Administration \$62,177.87, Code Enforcement \$123,000, and General Program Administration \$25,350. The recommendation was referred to the Human Services Committee, which is a standing committee of the Meriden City Council.

On December 8, 2011, Human Services Committee of the Meriden City Council held their regular meeting.

Staff present included:

Noreen Laurinaitis, Grants Administrator, Community Development Office

Lori Canney, City Council Secretary

Councilors in Attendance were:

Catherine R. Battista, Chairperson,

Hilda Santiago,

Matthew C. Dominello, Sr.

Others in Attendance were:

Robert Cappelletti, Meriden Housing Authority

Members of the public

Ms. Laurinaitis informed those in attendance that \$506,654.60 in CDBG funds from Program Years 31 through 37 were to be reprogrammed to the following activities: Inner-City Sidewalks \$149, 626.73, Factory H Demolition Contingency \$90,000, MHA Security Cameras \$56,500, Rehabilitation Administration \$62,177.87, Code Enforcement \$123,000, and General Program Administration \$25,350.

The Councilors amended the resolution to decrease the amount of reprogrammed funds to \$504,404.60 with Inner-City Sidewalks being reduced to \$147,376.73. The change was due to the fact that NOW had provided program documentation and its 2010 award of \$2,250 had been paid and removed from the funds available for reprogramming. The Councilors unanimously adopted the amended resolution to reallocate the \$504,404.60 to the following activities:

CDBG – SUBSTANTIAL AMENDMENT
PROJECTED USE OF REALLOCATION FUNDS

Inner-City Sidewalks	\$ 147,376.73
Factory H Demolition Contingency	\$ 90,000.00
MHA Security Cameras	\$ 56,500.00
Rehab Administration	\$ 62,177.87
Code Enforcement	\$ 123,000.00
General Program Administration	\$ 25,350.00
TOTAL	\$504,404.60

Meriden’s City Council adopted the amended resolution for the CDBG substantial amendment on December 19, 2011.

Public Comments

Comments on the substantial amendment’s proposed reallocation of funds were received from Colleen Cyr, Meriden, Connecticut. Ms. Cyr cited a concern that there was no definitive proof that the MHA security camera project would improve the MHA’s substandard physical rating. The rating she stated was based on deficiencies at the Mills Memorial Public Low Income Housing Complex.

Response to Public Comment

The MHA security camera project was identified by MHA as a project ready to proceed that would meet a public housing need. The funds allocated to the MHA Downpayment Assistance Program were reprogrammed as part of the substantial amendment due to the lack of available beneficiaries. MHA was offered the use of the funds to meet another critical need for its residents. MHA reported that recent unsolved crimes at Community Towers, the age of the current security system, and the lack of HUD Capital Improvement funds for the project made this activity a critical need. City staff determined that the project would also meet 24 CFR Part 91.220(h), Public housing

needs. The City will develop actions to provide financial or other assistance to improve MHA's operations and remove its "troubled" designation in the creation of the CDBG 38 Annual Action Plan.

Changes to the CD 31 through CD 37 Annual Plans

Changes to the funding allocations for activities in CD 31 through CD 37 Annual Plans has been made per the schedule in Attachment A. The Projects, Needs and Summaries worksheets have been updated.

Summary of Environmental Review

The Rehab Administration and General Program Administration activities are administration and management activities and are exempt from the Environmental Review process under 58.34(a)(3), which states that activities that have no physical impact or result in a physical change are exempt. The Code Enforcement Activity is an inspection and testing activity and is exempt from the Environmental Review process under 58.34(a)(5), which states that activities that have no physical impact or result in a physical change are exempt. The Factory H Demolition Contingency Environmental Record Review was conducted as part of the Section 108 activity and has been completed. Inner-City Sidewalks and MHA Security Camera activities are categorically excluded from the provisions of NEPA. Under a review of 58.35(a) it was determined that further environmental review is required. In accordance with 58.35(a)(1), as sites are identified for this activity, a site specific review in accordance with Section 58.5 and environmentally cleared, the ERR will be updated. Site specific activities will be converted to exempt activities as applicable and supporting documentation maintained.