



**U.S. Department of Housing and
Urban Development**
Region X Portland Field Office
Community Planning & Development Division

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September 21, 2016

Scott Lindberg
Grants Specialist
Parks and Community Development Department
City of Grants Pass
101 NW A Street
Grants Pass, OR 97526

Dear Mr. Lindberg:

SUBJECT: 2016 Action Plan Review

Thank you for submitting the City of Grants Pass' 2016 Action Plan on time to this office. We received it on August 14, 2016. We have carefully reviewed it for compliance with the consolidated plan regulations at 24 CFR Part 91. We determined that the Action Plan is substantially complete. All the activities appear to be eligible and address the community's needs.

The review was specifically based on the requirements for action plans at 24 CFR 91.220, certifications at §91.225, monitoring at §91.230, and the guidance for annual action plans found on the web at: <http://www.hud.gov/offices/cpd/about/conplan/index.cfm>. Enclosed is our complete review of your action plan.

We look forward to working with you and your staff to support your ongoing work to meet the goals of the City's 2015-2019 Consolidated Plan. If you have any questions about the enclosed comments or need technical assistance, please do not hesitate to contact Jason Triplett, at (971) 222-2617 or Jason.T.Triplett@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "DC" followed by a flourish.

Doug Carlson, Director
Community Planning and Development

Enclosure

**Comments on the City of Grants Pass, Oregon,
Annual Action Plan Program Year PY 2016
Community Development Block Grant Program**

This review summarizes the comments, corrections and clarifications required to the City of Grants Pass' PY 2016 Annual Action Plan. These comments are intended to provide feedback on the City of Grants Pass' Plan and to assist in clarifying and developing future plans to meet the requirements in 24 CFR 91.100 through §91.230. For additional guidance, you are advised to consult HUD's website on consolidated planning located at:

<http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/guidance/#local>

The plan was reviewed by the offices of Community Planning and Development, Fair Housing and Equal Opportunity, Public Housing, and the Portland Field Office based on:

- The guidance for Consolidated Plans on the web at:
<http://www.hud.gov/offices/cpd/about/conplan/index.cfm>
- The consolidated plan regulations at 24 CFR 91.220, Action Plan; §91.225, Certifications; and 91.230, Monitoring

**Office of Community Planning and Development Comments on the PY 2016
Annual Action Plan Review**

Action Plan (§91.220)

The City of Grants Pass (the "City") selected to utilize HUD's new eCon Planning Suite in IDIS for developing its PY 2016 Annual Action Plan. The City successfully completed the screens for the Action Plan and submitted the plan in IDIS on time.

Standard Form 424 (§91.220(a)) & Certifications (§91.225)

The City's Action Plan for federal assistance includes a SF-424, the City's DUNS number, and is signed by City Manager, Aaron K. Cubic. The correct amount is listed on line 18a as \$300,069. Our review included ensuring the completeness and accuracy of required certifications. The general and CDBG certifications were complete, signed, and in conformance with the regulations.

Funds Available

This Action Plan is based on the City's PY 2016 grant amount of \$300,069. In addition, the City has identified prior year resources of \$114,811, equaling \$414,880 for PY 2016.

Based on the City's proposed plan the expenditure limits are as follows:

- The City will not exceed the 20 percent CDBG administrative cap based on an estimated \$60,013 for administrative activities.
- The City will not exceed the 15 percent CDBG public service cap based on an estimated \$32,000 for public service activities.

Possible Areas of Concern

- The City was unable to consult with a handful of required entities that were to be consulted, pursuant to 24 CFR 91.100 (please see pages 2-3 of the 'Grants Pass Annual Action Plan Checklist' along with the explanation as to why these entities were not consulted). With the City embarking on housing rehabilitation activities, the City will want to consult with state agencies that specialize in lead-based paint health issues.

Office of Fair Housing and Equal Opportunity (FHEO) Comments on the PY 2016 Annual Action Plan

FHEO has completed its civil rights review of the Annual Action Plan (AAP) submitted by the grantee. The purpose of the review is to evaluate whether the City has planned to affirmatively further fair housing choice by developing action steps that are designed to eliminate identified or otherwise obvious impediments to fair housing choice and to reduce minority concentrations in impoverished areas. In addition, the City should provide the details of how the actual implementation will occur, including clear timelines, milestones, resources, and projected outcomes. The City has not completed its Analysis of Impediments to Fair Housing Choice ("A/I") therefore FHEO is unable to evaluate the City's AAP to assess whether it plans to undertake activities to affirmatively further fair housing and to eliminate impediments to fair housing in the jurisdiction.

FHEO requests that the City submit for review its Analysis of Impediments as soon as it is finalized. The City's A/I should reflect specific actions it plans to undertake to remove barriers to fair housing choice after the Analysis of Impediments is finalized. The actions items should be presented in terms that are specific, measurable, attainable, realistic, time-based, establish accountability, and identify the needed resources (sub-recipients and funding amounts), at a minimum. The City should clearly describe the nexus between proposed actions and the affirmative furtherance of fair housing choice. That is, the City should explain how the actions will work to eliminate housing discrimination and reduce minority concentrations. FHEO recommends that the City set milestones and measurable results to guide and facilitate the implementation of the fair housing actions. The City must maintain sufficient records to document the actions and activities carried out to remedy impediments to fair housing choice.

If the City needs need technical assistance or if there are any questions regarding this review, please contact Farrah Ward, Equal Opportunity Specialist, at (971) 222-2632 or at Farrah.T.Ward@hud.gov.

Portland Field Office Comments on the PY 2016 Annual Action Plan

The Portland Field Office has no comments on this plan.

Public Housing Portland Office Comments on the PY 2016 Annual Action Plan

This office has no comments.