

Program Description

Regional Housing Rehabilitation Loan Program of Lane County (RHRP)

<u>Grantee</u>	<u>Sub-Grantee</u>
City of Florence 250 Highway 101 Florence, OR 97439	St. Vincent de Paul Society of Lane County P.O. Box 24608 Eugene, OR 97402

The service area for the RHRP includes the Oregon Cities of Florence, Veneta, Oakridge, Westfir, Lowell, Cottage Grove, Junction City and Creswell as well as unincorporated portions of Lane County.

The RHRP provides deferred-payment loans to low and moderate income homeowners as per current HUD income eligibility guidelines for rehabilitation services to the home where the homeowner occupies no less than 50% of the living space. "Major" rehabilitation (Rehab loan is more than 50% of the value of the Structure) is only allowed under the approved RHRP policy when using Non-CDBG funds such as funds in the Revolving Fund account that have been de-federalized. In this case and for all newly awarded CDBG funds for owner occupied housing rehabilitation, the RHRP will perform only "Minor" (Rehab loan is 50% or less of the value of the Structure) rehabilitation projects. All minor rehabilitation projects will not allow for alteration or expansion of the existing building foot print, does not include acquisition of existing housing, land or perform new construction. Furthermore, the RHRP does not engage in re-zoning for minor projects including conversion of farmland to non-agricultural uses nor does the RHRP increase residential densities, convert a building for habitation or make a vacant building habitable.

The RHRP does many types of project activities to meet or exceed our objective of alleviating health and safety issues, correcting structural deficiencies in order to help conserve existing housing stock, increase housing opportunities and enable lower income homeowners to remain in their homes. Eligible rehabilitation activities include Septic Systems and private Sewer connections, Well and Water Supply, Foundation and Crawl Space Repairs, Electrical Systems, Heating Systems, Water Heaters, Plumbing, Siding, Paint, Windows, Doors, Roofs and roof Drainage, Dry rot repairs, Flooring repairs, Weatherization measures, Insulation, Hazardous tree removal, Landscaping – trimming shrubs for preservation of the dwelling, Lead work (inspection, assessment, lead safe work practices and clearance inspection), Asbestos testing and removal of Architectural Barriers and installation of Accessibility measures as per reasonable accommodation requests.

Items that are identified in the Statutory Worksheet as status B will require site specific review. St. Vincent de Paul has established procedures for identifying properties that will require further review. For Historic Preservation, all projects with a home, determined from the Regional Land Information Database of Lane County (RLID), to be older than 45 years, documentation such as the project scope of work, elevation photos and any other relevant information, will be submitted for review, comment and concurrence by the State Historic Preservation Office (SHPO). Furthermore, projects involving ground disturbing activities will be submitted for review with SHPO and respective Tribal Historic Preservation Office (THPO) will be notified of such activity and an Inadvertent Discovery Plan will be implemented

when needed. In regards to Endangered Species the provided guidance shall be followed and each project will complete the Procedure for Section 7 Determination Worksheet for each project to confirm the effect. Noise abatement will be considered and mitigation technics such as double pane windows and insulation may become part of the scope of work for all project properties that are determined with high noise levels. For projects, where upon site inspection, detection or suspicion of Toxic chemicals or Radioactive materials may be present, an appropriate specialist will be used to assess the risk and propose corrective measures. All project properties will be screened for the potential of Flood Disaster by obtaining a third party Flood Report. Projects that are determined to be within a 100 year flood plain will require Flood insurance in accordance with Federal rules and RHRP policy.

The historical average RHRP loan is just over \$23,000 and in consideration of anticipated costs dealing with Lead based paint, it is assumed that the average loan will be \$25,000. This new CDBG award provides an approved budget for eligible housing rehabilitation of \$300,000, thus we expect to serve at least 12 household units.

Environmental Justice (CEST and EA)

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	
References		
https://www.hudexchange.info/environmental-review/environmental-justice		

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes → *Continue to Question 2.*

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

Explain:

→ *Continue to Question 3. Provide any supporting documentation.*

No

Explain:

→ *Continue to the Worksheet Summary and provide any supporting documentation.*

3. All adverse impacts should be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Mitigation as follows will be implemented:

→ Continue to Question 4.

No mitigation is necessary.

Explain why mitigation will not be made here:

→ Continue to Question 4.

4. Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.

→ Continue to the Worksheet Summary and provide any supporting documentation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Since eligible recipients for the program funds are low to moderate income persons, there will be no disproportionate impacts. Furthermore, the program does not allow acquisition of existing housing, acquisition of land for development and new construction. See Program Description with highlighted sections (Tab M) and Section 1.2 of Program Policies (Tab C), HUD Environmental Checklist and Environmental Justice Certification by the RE. (Tab M)

Are formal compliance steps or mitigation required?

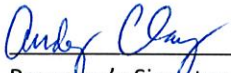
Yes

No

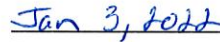
Environmental Justice Certification

The City of Florence and its Sub-grantee's agent, St. Vincent de Paul Society of Lane County (SVdP) has conducted a review of the Environmental Justice Act (Executive Order 12898) and has made the following determinations regarding the Regional Housing Rehabilitation Program of Lane County (RHRP) Florence Project #H21009.

This project ER determines that since the program does not allow for the acquisition of existing housing, acquisition of land for development or new construction, that there will be no adverse environmental impact and that since the program serves low-moderate income (LMI) owner occupied households that there will be no disproportionate impact to minority or low and moderate income persons.



Preparer's Signature



Date

Andy Clay, St. Vincent de Paul, RHRP Manager

Name & Title



Certifying Officer

January 3, 2022

Date

Joe Henry, Mayor, City of Florence

Name & Title