



*City of Berwyn*  
THE CITY OF HOMES

**Community Development Department**



June 23, 2022

# PY 2020-2024 Amended Consolidated Plan

June 7, 2024 (Draft)



# Substantial Amendment to PY 2020-2024 Consolidated Plan For CDBG Funds

## Introduction

The City of Berwyn (“Berwyn”) submitted its 2020 – 2024 Consolidated Plan (the “Plan”) to the United States Department of Housing and Urban Development (“HUD”) on August 14, 2020. Among other items, the Plan on page 43, *SP-25 Priority Needs – 91.415, 91.215(a)(2) Priority Needs Table 13 – Priority Needs Summary* included Affordable Housing as a high priority.

The *Table 13 – Description* stated: “*Rehabilitation and emergency repair of single family homes for low- and moderate- income households and persons with disabilities.*”

Due to low participation of residents in the program, the City of Berwyn seeks input from the public on the proposed amendment to the 2020-2024 Consolidated Plan by eliminating additional funding in PY 2024 Single Family Rehabilitation (SFR) program.

As a result of the COVID-19 Pandemic the lack of contractors, supply chain issues, and residents willing to participate in the program, substantial unspent funds allocated in previous years remain to continue the City of Berwyn’s SFR program.

Berwyn will continue with the (SFR) program and encourage eligible homeowners to apply for assistance. The City’s aging housing stock can fall into disrepair for low- and moderate-households, leading to growing health and safety risks and reducing the viability of neighborhoods. Funds continue to remain available in support of the program.

In addition, among other funding allocations, the Plan on page 55, *SP-45 Goals – 91.415, 91.215(a)(4) Goals Summary Information* included \$592,114 of funding over the five years of the Plan for the goal of Affordable Housing Rehabilitation. The Consolidated Plan allocated approximately \$118,422 per year in each Annual Action Plan for the Affordable Housing Rehabilitation Program. The City will reduce the number of housing units rehabilitated from 30 to 10 as a result of funding reduction and rising rehabilitation costs.

On July 14, 2022 the Community Development Department submitted to Cook County the first Substantial Amendment to the City of Berwyn’s 2020 Action Plan which included the cancellation and reallocation of the PY 2020 Single Family Rehabilitation Program funds.



It should be noted that with this and the PY 2020 reduction, the Plan has allocated \$425,000 over the five years of the Plan for the Single Family Rehabilitation Program. Berwyn is confident no additional funds need to be reallocated to this program to increase its outreach.

These SFR funds will be reallocated to Public Improvements and Facilities, specifically the sidewalk, sewer and street replacement projects (“Projects”). In addition to improving critical infrastructure, these Projects also enhance the living environment of the blocks/neighborhoods where the work takes place.

### **Substantial Amendment Required**

Title 24 Section 91.505 of the Code of Federal Regulations stipulates that participating jurisdictions shall amend their approved plans whenever they make one of the following decisions:

1. To make a change in its allocation priorities or a change in the method of distribution of funds.
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or
3. To change the purpose, scope, location or beneficiaries of an activity.

The Regulation further requires the jurisdiction identify in its Citizens Participation Plan the criteria to be used to determine what constitutes a substantial amendment. Consistent with these requirements, Berwyn’s Citizen Participation Plan adopted by Berwyn on November 28, 2017, requires a substantial amendment to the Plan as follows:

*“a. Revision Considerations*

*There are two (2) types of amendments that may occur with the CON PLAN: minor amendments and substantial amendments. An amendment to the approved CON PLAN is considered substantial under the following circumstances:*

- 1) To make changes to its activity priorities or the method of distribution of funds.*
- 2) To carry out an activity using funds for any program covered by the ACTION PLAN but not previously described in the CON PLAN,*
- 3) Changes in the use of CDBG funds from one eligible activity to another,*
- 4) To change the activity, purpose, scope, location or beneficiaries of an activity.”*

The proposed changes meet at least one of these criteria. Therefore, a substantial amendment to the Plan is required.



## **Citizens Participation**

In accordance with 24 CFR 91.105(c)(3) for local governments, and Berwyn's Citizens Participation Plan, the substantial amendment "30 Day Comment Period/Public Notice" for the use of CDBG funds was released for citizen review and comment on June 6, 2024 by publication, in both English and Spanish, in the Lawndale News. During the 30 day public comment period from June 7, 2024 to July 9, 2024, the *Draft Substantial Amendment to the 2020-2024 Consolidated Plan* was made available for review during regular business hours at the following locations: (1) Berwyn City Hall, (2) Berwyn Public Library, and (3) Berwyn Community Development Department Offices. It was also available for review at any time on Berwyn's website: [www.berwyn-il.gov](http://www.berwyn-il.gov).

The Berwyn City Council, at its Committee of the Whole, will hold a public hearing on the *Draft Substantial Amendment to the 2020-2024 Consolidate Plan* on July 9, 2024 at 7pm in Berwyn City Hall, 6700 W. 26<sup>th</sup> Street, Berwyn, Illinois. On that same date at 8pm, at the Berwyn City Council Meeting, the City Council will vote on the approval of the *Draft Substantial Amendment to the 2020-2024 Consolidate Plan*.

A copy of the "30 Day Comment Period/Public Notice" is attached hereto as Exhibit 1. A copy of all citizen comments received during the 30 day comment period, or at the public hearing, (if any) are attached hereto as Exhibit 2. Berwyn's response to citizen comments (if any) is attached hereto as Exhibit 3. The Resolution of the Berwyn City Council approving the *Substantial Amendment to the 2020-2024 Consolidate Plan* is attached hereto as Exhibit 4.

## **Final Action**

### **Activity/Funding Amendment**

1. Berwyn will not add additional funding for the Single Family Rehabilitation program in PY 2024. The program will continue in PY 2024 using unspent funds from PY 2021 and 2022. This amendment reduces the total funding allocated to the SFR Program from \$592,114 to \$425,000 during the consolidated plan period.
2. Berwyn will reallocate \$167,114 of SFR funds to Public Improvements and Infrastructure in low- and moderate- income neighborhoods, increasing the funding from \$4,186,300 to \$4,353,414.



# **Exhibit 1**

Proof of Publication  
30 Day Comment Period/Public Notice  
Lawndale News, June 6, 2024



## **Exhibit 2**

Public Comments





## **Exhibit 3**

### Response to Public Comments



## **Exhibit 4**

Resolution 2024 - \_\_\_\_\_ of the Berwyn City Council  
Approving the Substantial Amendment to the  
2020-2024 Consolidate Plan