

Richland County Community Development Substantial Amendments Process | June 2025

EXECUTIVE SUMMARY OF PROPOSED SUBSTANTIAL AMENDMENTS TO THE

2017 ANNUAL ACTION PLAN 2018 ANNUAL ACTION PLAN 2020 ANNUAL ACTION PLAN 2021 ANNUAL ACTION PLAN

2024 ANNUAL ACTION PLAN

Jurisdiction: Richland County, South Carolina	Responsible Entity: Community Development Office:
Jurisdiction Web Address: <u>http://richlandcountysc.gov</u>	Address: Richland County Government 2020 Hampton Street, Suite 3058 Columbia, SC 29204
	Telephone: (803)576-2230 communitydevelopmentinfo@richlandcountysc.gov

http://richlandcountysc.gov/government/departments/community-development

Timeline for Substantial Amendments Process:

Public Notice Published: Sunday, June 1, 2025 in The State newspaper

30-Day Public Comment Period: June 3 – July 3, 2025

Public Hearing: Monday, June 9, 2025 at 6:00PM

Committee Review: Tuesday, June 24, 2025 at the Admin & Finance Committee

Council Approval: Tuesday, July 8, 2025

Submission to HUD: Following Council approval.

Summary of Substantial Amendments:

The proposed Substantial Amendments to the 2017, 2018, 2020, and 2021 Annual Action Plans reallocate and consolidate **\$1,165,250.20** of available HOME Investment Partnership (HOME) funds to allow for more flexible and efficient investments into the development of affordable housing in unincorporated Richland County.

The proposed Substantial Amendment to the 2024 Annual Action Plan reallocates **\$205,000.00** in Community Development Block Grant (CDBG) funds from a cancelled Public Facility Improvement activity to be made available for a shovel-ready Public Facility Improvement activity in unincorporated Richland County.



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A Substantial Amendment to any Annual Action Plan is required whenever the proposed action meets the following criteria as listed in the County's CDBG Citizen Participation Plan:

- a) any addition or deletion of major proposed activities
- b) an increase or decrease greater than 50% in a budget line item

Grant Funding Background

CDBG and HOME Investment Partnership grant funds are provided on an annual basis to the County following allocation by Congress and the U.S. Department of Housing and Urban Development (HUD). The County is required to develop and Annual Action Plan (AAP) to guide each year's allocation of grant funds. The County has seven (7) years to expend CDBG funds on an eligible project and eight (8) years to expend HOME funds on an eligible affordable housing activity.

The build-up of HOME Investment Partnership Funds from 2017-2021 is a result of cancelled projects and programs, the repayment of funds back to HUD for cancelled activities, and challenges with staff turnover and program closures during the COVID-19 Pandemic.

The proposed Substantial Amendment to the 2024 Annual Action Plan is the result of a cancelled Public Facility project with Vital Connections of the Midlands after their property acquisition opportunity fell through.

Staff Recommendations, Best Practices, and Strategic Funding Reallocations

Staff is recommending the following reallocations of HOME Investment Partnership (HOME) Funds and Community Development Block Grant (CDBG) Funds:

I) Reallocating HOME Funds:

- Project Changes: Proposed Substantial Amendments to the 2017, 2018, 2020, and 2021 Annual Action plans delete eight (8) narrowly defined Affordable Housing Projects spanning four Annual Action Plans that stalled or were cancelled altogether. As a result, \$1,059,622.09 in available, built-up HOME funds will be reallocated to a new, broadly defined project called *"Development of Affordable Housing."* The new project consolidates available funds to create a singular, flexible Affordable Housing Project that allows for the more efficient investment of HUD funds.
- Expiring Funds: HOME funds expire after eight (8) years. These amendments will allow for the timely expenditure of funds to ensure HOME dollars are expended prior to upcoming expiration deadlines of September 30, 2025 (for 2017 funds) and September 30, 2026 (for 2018 funds).

II) Reallocating CDBG Funds:

Project Changes: The amendment to the 2024 Annual Action Plan is being



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conducted to remove an allocation of CDBG funds from a Public Facility Improvement activity for Vital Connections of the Midlands, allowing funds to be made available to qualified, shovel-ready projects. County staff are actively engaged in project development efforts to identify a strong replacement project that serves the Low/Mod population in unincorporated areas of the County.

 CDBG Timeliness Test: HUD annually evaluates whether Community Development Block Grant (CDBG) Grantees are carrying out their programs in a timely manner as evidenced by their use of CDBG funds. This assessment occurs each year on August 2nd. Reallocating unused funds enables Richland County Community Development to meet HUD's annual timeliness test and ensure continued program compliance.

It is a best practice in the development of Annual Action Plans to include broadly defined Projects that allow for maximum flexibility, the ability to pivot investment priorities in response to changes in the housing market and economy, and to maneuver through unexpected challenges that arise with potential Subrecipients.

Impacted Projects:

Each year, the County uses public input to develop an Annual Action Plan (AAP) that guides the investment of each annual allocation of CDBG and HOME awards. The plans allocate funds to specific projects aimed at benefiting low-to-moderate-income (LMI) households in unincorporated Richland County. These Substantial Amendments will reallocate funds in prior year AAP's from one project to another, allowing the County to quickly put the funding to work.

The **\$1,165,250.20** in HOME funds will be reallocated to Development of Affordable Housing from the following Projects:

Program Year & Project/Activity	Available HOME Funds	A ctivity Status
2017: CHDO Set-Aside	\$135,000.00	Funds repaid to HUD after a cancelled homeownership project.
2018: Richland Rolls	\$80,000.00	Project stalled, program never opened.
2020: Richland Rebuild	\$360,000.00	Project stalled due to staff turnover during COVID-19 Pandemic.
2020: CHDO Set-Aside	\$118,634.00	Project stalled due to staff turnover during COVID-19 Pandemic.
2021: Richland Rebuild	\$360,000.00	Project stalled due to staff turnover during COVID-19 Pandemic.
2021: CHDO Set-Aside	\$111,616.20	Project stalled due to staff turnover during COVID-19 Pandemic.
Total to be Reallocated	\$1,165,250.20	

Table I: Details on Impacted HOME Projects



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These reallocated HOME funds will be consolidated into a Project in each plan called **"Development of Affordable Housing."** These Projects will allow for eligible nonprofit, faith-based, and private entities to seek HOME funding for affordable housing developments that create rental and homeownership opportunities through acquisition, rehabilitation, and new construction. County staff can tap funds from as far back as 2017 to strategically invest.

Table II: Remaining Funds in Impacted HOME Projects:

Updated Allocations in 2017-2024 Annual Action Plans for Impacted HOME Projects (in dollars)								
	Original Allocation Balances			Revised Allocation Balances				
	2017-2021	2022-2024	Total	2017-2021	2022-2024	Total		
	Funds	Funds	Allocations	Funds	Funds	Allocations		
Project Name								
CHDO Set-Aside	\$365,250.20	\$389,725.00	\$537.731.09	\$0.00	\$389,725.00	\$389,725.00		
Richland Rebuild	\$350,684.13	\$720,000.00	\$1,100,642.07	\$350,684.13	\$0.00	\$350,684.13		
Richland Rolls	\$80,000.00	\$0.00	\$80,000.00	\$0.00	\$0.00	\$0.00		
Development of Affordable Housing	\$0.00	\$1,648,252.80	\$1,648,252.80	\$445,250.20	\$1,648,252.80	\$2,093,503		

The **\$205,000.00** in CDBG funds will be reallocated to Public Facility Improvements Project from the following Project:

Table III: Details on Impacted CDBG Projects

Program Year & Project/Activity	Available CDBG Funds	Activity Status
2025: Vital Connections of the Midlands		Project cancelled after lost acquisition opportunity.
To be Reallocated:	\$205,000.00	

These CDBG funds will be made available to qualified, shovel-ready Public Facility Improvement projects. Through the 2025 CDBG Notice of Funding Availability (NOFA) process, County staff are actively engaged in project development efforts to identify a strong replacement project that serves the Low/Mod population in unincorporated areas of the County.

Investing these Funds:

This Substantial Amendments process is running in tandem with County efforts to seek and develop eligible, impactful projects for the investment of these funds. The Notice of Funding Availability (NOFA) process for CDBG projects was conducted from February - May 2025 which has created a strong pipeline of potential projects. The NOFA for the HOME Investment Partnership Program calling for Affordable Housing Development projects is launching in June 2025 with a rolling deadline for submission. There



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are already several eligible projects with local partners who are ready to apply for HOME funding.

Once Substantial Amendments are approved by Council and HUD, County Staff are positioned to begin bringing eligible projects to Council for consideration for both the HOME and CDBG funding opportunities.

Impact on Annual Action Plan Goals and Objectives

The proposed Amendments are in keeping with the 2017-2021 Five-Year Consolidated Plan and 2022-2026 Five-Year Consolidated Plans and associated Annual Action Plans. There are no changes to the goals as originally proposed. Goals associated with the development of affordable housing units and the improvement of public facilities serving the LMI community remain.

Public Comment

In alignment with Richland County's Citizen Participation Plan, a public notice was posted in *The State* newspaper Sunday, June 1, 2025 and a 30-Day public display and comment period for the proposed Substantial Amendments will occur from June 3, 2025-July 3, 2025. In addition, a public hearing is scheduled to be held regarding the proposed Substantial Amendments on Monday, June 9, 2025 at 6:00 PM in the Council Chambers prior to its approval by County Council for submission to HUD.

A summary of public comments received regarding the proposed Substantial Amendments will be included in the final submission to HUD.

Attachment: Notice of 30-Day Public Comment Period