

Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds

May 1, 2020

Name of Responsible Entity [RE]: City of Cincinnati
801 Plum Street
Cincinnati, Ohio 45202
(513) 352-6146
communitydevelopment@cincinnati-oh.gov

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Cincinnati.

REQUEST FOR RELEASE OF FUNDS

On or about May 15, 2020 the City of Cincinnati will submit a request to the United States Department of Housing and urban Development, the administering agency, for the release of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA) funds under Title 1 of the Housing and Community Development Act of 1974 (PL 93-383), as amended, to undertake the projects listed for the purpose listed below with specific project locations if applicable.

All programs have been reviewed to determine the level of environmental review required as well as the documentation required in the environmental review record.

The following programs have been determined to be categorically excluded per 24 CFR 58.35(a) and subject to 24 CFR 58.5; all projects will receive a further case-by-case review before funds may be released to the specific activity:

Grant	Program Name	Project Description	2020 Budget
CDBG	Commercial and Industrial Redevelopment Program	<p>The Commercial and Industrial Redevelopment Program, formerly known as The Strategic Program for Urban Redevelopment (SPUR) facilitates catalytic redevelopment of abandoned, vacant, or underutilized industrial and commercial sites throughout the City. The program focuses on addressing environmental contamination and obstacles preventing development of blighted areas, specifically in areas with imminent threats to human health and the environment. The funds are utilized for environmental assessments, contamination remediation, public improvements, infrastructure improvements, acquisition, demolition, stabilization, and other related activities to facilitate redevelopment.</p> <p>For the purposes of this FONSI, the activities covered by this program will only address facilities and improvements that are in place and will not alter size or capacity by more than 20% and will not involve a change in land use.</p>	\$45,677
CDBG	Compliance Assistance Repairs for the Elderly (CARE)	The CARE program provides grants to low income, elderly and/or disabled homeowners to correct code violations issued pursuant to an exterior property condition inspection and code enforcement action. The assistance includes correcting emergency exterior code violations such as leaking roofs, dilapidated porches, unsafe stairs, exterior wall repair, and painting.	\$10,000
CDBG	Floating Initiatives for Strategic Housing (FISH)	FISH will provide a float loan for gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Floating Initiatives for Strategic Housing is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.	\$0

Grant	Program Name	Project Description	2020 Budget
CDBG	Green Urban Watershed Restoration	Green Urban Watershed Restoration will work to build and strengthen capacity in order to focus on community and economic development, public facilities, community engagement, streetscape activities, and increase professional capacity. Green Urban Watershed Restoration focuses on the urban environment and civic engagement to catalyze community-driven change creating community parks and green spaces, building healthy communities, revitalizing urban waters and the communities in the urban core. The program also includes a green workforce development program providing job readiness, basic environmental and technical skills, water testing, greenhouse skills, invasive species removal and green infrastructure improvement. Participants in the job training program will receive multiple certifications and trainings pertinent to their work and job sector at large.	\$5,000
CDBG	Hazard Abatement Program	The mission of the Hazard Abatement Program is to preserve public health, safety, and welfare through demolition or barricading of blighted buildings. The program demolishes condemned buildings after normal code enforcement activities have been exhausted. The program also secures vacant abandoned buildings against entry by trespassers.	\$75,000
CDBG	Historic Stabilization of Structures	The Historic Stabilization of Structures Program abates public nuisance conditions and stabilizes historic properties. Under Ohio Law if there is a historic building that is deemed a public nuisance, the City has the right to abate the public nuisance conditions without taking ownership of the property. This program is designed to maintain the public health, safety, and welfare while at the same time preserving the historic structures for potential future rehabilitation.	\$20,000
CDBG	Housing Repair Services	The Housing Repair Services Program provides grants for emergency and critical repairs to very low-income homeowners. Emergency services are limited to two emergencies per household per year and have a maximum of \$2,500. Critical repairs are those needed for the safety of the property owner and have a maximum of \$10,000. This program will also address code violations for low income homeowners. In addition to addressing housing repairs for homeowners, this program addresses the mobility needs of disabled and elderly renters and owner-occupied units and will address healthy home issues that may be causing health effects of the occupants.	\$185,000

Grant	Program Name	Project Description	2020 Budget
CDBG	Neighborhood Business District Improvement Program	The Neighborhood Business District Improvement Program enhances the business environment in the City's neighborhood business districts by constructing streetscape, public improvements, public facilities, infrastructure, façade improvements, or other development activities. The projects are awarded on a competitive annual application process after an extensive peer review.	\$92,000
CDBG	Revolving Initiatives for Strategic Housing (RISH)	RISH will provide revolving loan funds for gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Revolving Initiatives for Strategic Housing is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.	\$0
CDBG	Strategic Housing Initiatives Program (SHIP)	SHIP provides gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.	\$50,000
CDBG	Vacant Lot Reutilization	The Vacant Lot Reutilization program funds the reuse of vacant and blighted lots in eligible census tracts into gardens or pocket parks.	\$3,000

Grant	Program Name	Project Description	2020 Budget
HOME	American Dream Down Payment Initiative	The American Dream Down Payment Initiative (ADDI) program funds down payment assistance for the purchase of single-family owner-occupied housing by first-time, eligible low to moderate income homebuyers or eligible homebuyers that have not owned property in the last three years. ADDI funds are not to exceed \$14,999. ADDI funds are awarded as a five-year non-interest-bearing deferred loan payment with a five-year residency requirement. All or a portion of the funds will be recaptured in the event a homeowner moves from the residence, sells or transfers ownership during the five-year residency period. All ADDI recipients are required to take a HUD-approved homebuyer counseling course in advance of receiving this assistance.	\$150,000
HOME	CHDO Development Projects	HUD requires that at least 15% of the federal HOME allocation be used in development projects in partnership with Community Housing Development Organizations (CHDOs). These funds will be used for both rental and homeowner projects, new construction and renovations, with certified CHDOs. CHDOs are required to re-certify their designation annually.	\$0
HOME	Single Family Homeownership Development	Habitat for Humanity of Greater Cincinnati builds and renovates single family homes for low-to moderate-income homebuyers. The program provides construction subsidy and homebuyer assistance. Eligible costs include infrastructure and construction costs for newly constructed or rehabilitated units, construction alterations to blend units with existing neighborhood styles, and accessibility modifications.	\$0
HOME	Strategic Housing Initiatives Program (SHIP)	SHIP provides gap financing for construction and renovation of multifamily units and single-family development, and permanent supportive housing. Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.	\$1,988,454

The following programs have been determined to be categorically excluded according to 24 CFR 58.35(b) and not subject to 24 CFR 58.5:

Grant	Program Name	Project Description	2020 Budget
CDBG	Emergency Mortgage Assistance	The Emergency Mortgage Assistance program provides in-depth foreclosure prevention counseling, negotiations with mortgage companies, legal assistance and case management to prevent foreclosure. When homeowners are facing foreclosure due to job loss, illness, death of the primary wage earner, or other circumstances beyond their control, the program may provide up to three months of mortgage payments to bring their loans current.	\$19,000
CDBG	Project Lift	Project Lift will target low income individuals and families to provide supportive services and improve the economic self-sufficiency of families in the region, including access to affordable housing, housing services, permanent housing placement, short-term payments for rent, mortgage, or utilities, and assistance in gaining access to government benefits. The program may focus on residents in Neighborhood Revitalization Strategy Areas (NRSAs) and the Empowerment Zone.	2019: \$600,000 2020: \$60,000
CDBG	Small Business Services	The Small Business Services Program includes technical assistance for start-ups and growth needs of micro-enterprises and small businesses. Areas of assistance include capacity development, business education and coaching, entrepreneurial training, incubation and technical assistance, loan packaging, accounting services, legal services, appraisals, environmental assessments, and inventory control audits. The program includes a revolving loan program to fill financing gaps for small to mid-sized businesses that create and/or retain jobs for low to moderate-income individuals as well as funds for redevelopment activities. The program also includes financial assistance for start-up small businesses and growing businesses with established need.	\$15,000
ESG	Emergency Solutions Grant	ESG funds the operation of emergency shelter facilities as well as essential services for the residences. A maximum of 60% the annual ESG allocation may be utilized for shelter funds. ESG Rapid Re-Housing activities include a shelter diversion program that will serve individuals and families at risk of homelessness by providing Housing Relocation and Stabilization Services as well as long-term Tenant Based Rental Assistance (TBRA), security deposits, and utilities.	\$937,595

Grant	Program Name	Project Description	2020 Budget
HOPWA	HOPWA Services and Support	HOPWA funds will provide housing assistance through Short-Term Rent, Mortgage, and Utility Assistance (STRMU), Tenant Based Rental Assistance (TBRA), and permanent housing placement. HOPWA-funded TBRA services approximately 25 households of individuals with HIV/AIDS that require assistance with rent or mortgage expenses. HOPWA funds will also be used to support the operation of Caracole's two transitional living facilities for 30 persons displaced by HIV/AIDS. Costs will include utilities, phone, insurance, regular maintenance, supplies and residential operating staff. In addition, HOPWA funding will be used to support the cost of nursing and personal care, case management, and meals for HIV/AIDS clients. All four providers, Center for Respite Care, Northern Kentucky Health Independent District, Shelter House Volunteer Group, and Caracole, provide these services.	\$1,106,930

The following programs have been determined to be exempt per 24 CFR 58.34:

Grant	Program Name	Project Description	2020 Budget
CDBG	Blueprint for Success	The Blueprint for Success Program is based on the Youth Build model, assisting ex-offenders, at-risk young adults, and veterans ages 18-30 in obtaining marketable construction skills while following a National Center for Construction Education and Research (NCCER) curriculum. Participants will undergo OSHA training, Lead Renovation, Repair, and Painting certification, and will receive on-the-job training as part of the curriculum.	\$10,000
CDBG	Code Enforcement Relocation	This project allows the City of Cincinnati to pay the first month's rent, security deposit, and moving expenses for persons moving to decent, safe and sanitary housing who have been displaced by code enforcement and/or the hazards of lead-based paint. City staff takes applications and provides vacancy and management company lists to clients.	\$0

Grant	Program Name	Project Description	2020 Budget
CDBG	Concentrated Code Enforcement	Inspections of homes and businesses are conducted in low to moderate census tracts throughout the city by the City of Cincinnati Department of Buildings and Inspections' code enforcement inspectors. Corrections achieved through Concentrated Code Enforcement (CCE) include repairing porches, roofs, windows, and siding, painting, and removal of dilapidated garages, fences and sheds. Owners receiving orders are informed of funding availability through the Department of Community and Economic Development to correct violations. Targeted areas are identified through an analysis of building code violations, vacant buildings, disorder and drug calls, drug arrests, as well as incidence of graffiti, junk autos, litter and weeds. Integrated services include concentrating building code enforcement, identifying crime hot spots, cleaning up streets, sidewalks, and vacant lots, beautifying landscapes, streetscapes and public right of way, and engaging property owners and residents to create and sustain a more livable neighborhood.	\$60,000
CDBG	Fair Housing Services	Housing Opportunities Made Equal (H.O.M.E.), the area's local fair housing agency, administers this program to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, Appalachian status, marital status, sexual orientation, military, gender identity, ancestry, gender identity, transgender status, or familial status and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing.	\$17,000
CDBG	Findlay Market Operating Support	Project funds increase the Corporation for Findlay Market's capacity to carry out community revitalization and economic development activities both at the Market and in the surrounding area. Included in this are costs related to supporting market promotion and events to increase the vibrancy of the market. Findlay Market is located in a low to moderate income area in the City's urban core.	\$10,000

Grant	Program Name	Project Description	2020 Budget
CDBG	Hand Up Initiative	The Hand Up Initiative provides job readiness and job training to transition Cincinnatians out of poverty. The program focuses on residents in Neighborhood Revitalization Strategy Areas (NRSAs) and the Empowerment Zone. The Hand Up Initiative recipients are tasked with providing individuals with wrap-around services for the purpose of removing barriers to employment. Those services include, but are not limited to, transportation, childcare, and employment counseling. Following completion of the Hand Up curriculum, participants receive employment counseling and coaching to facilitate appropriate job placement.	\$126,000
CDBG	Homeowner Rehab Loan Servicing	This program provides funding to service prior year redevelopment loans. This program covers the cost of servicing past loans with an outside vendor.	\$3,800
CDBG	Housing Choice Mobility Program	The Housing Choice Mobility Program promotes mixed-income neighborhoods, providing Housing Choice Voucher holders living in high poverty areas access to new neighborhoods.	\$0
CDBG	Lead Hazard Testing Program	Project funds are utilized for the code enforcement activities in eligible census tracts. Lead poisoning reduces IQ, increases tendencies of violence and delinquent behavior, affects a child's ability to learn, and is directly related to lower educational achievement. Children with lead poisoning have reduced lifetime earning potential and are more likely to live in poverty. Properties with Board of Health orders for lead hazard remediation are referred to the HUD Lead Paint Hazard Control Grant program when available.	\$20,000
CDBG	Operating Support for Community Development Corporations (CDCs)	This program provides operating and project support to build and strengthen capacity of eligible Community Development Corporations (CDCs). CDCs serve the region through rehabilitating affordable housing units, performing commercial and economic development, addressing public facilities and streetscape activities, and increasing community engagement in the neighborhoods.	\$30,000
CDBG	Tenant Representation	The Tenant Representation Program provides legal representation for low to moderate-income tenants. The program prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires property owners to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who contact the City about code violations.	\$23,000

Grant	Program Name	Project Description	2020 Budget
CDBG	Urgent Public Health Response Program	Urgent Public Health Response Program will assist low income individuals and families experiencing hardship in response to public health crisis, including health services, childcare services, transportation services, job training, services for senior citizens, youth services, and services for homeless persons. The program will focus on response to public health crisis needs.	\$8,320,398
CDBG	Youth and Young Adult Employment Program	The Youth and Young Adult Employment Program trains youth and young adults ages 14 to 24 in the areas of workplace etiquette and basic work skills by utilizing workshops, presentations, and on-the-job experiences. The program provides recipients with opportunities to explore their interests and career options in public, nonprofit, and private organizations.	\$45,000
HOME	Operating Support for Community Development Housing Organizations (CHDOs)	HUD allows that up to 5% of the federal HOME allocation may be used in operating support for Community Housing Development Organizations (CHDOs). These funds may be used to cover staff time, rent charges, and any other operating costs of the certified CHDOs.	\$140,848
CDBG	Section 108 Loan Debt Service	This covers debt service on existing CDBG Section 108 loans for Avondale Towne Center, Laurel Homes, Broadway Square, Anna Louise Inn and the Men's Shelter projects.	\$160,000
CDBG	Administration	20% annual CDBG allocation; 10% annual HOME allocation (currently waived to 25% for 2020); 7.5% annual ESG allocation; 3% annual HOPWA allocation	\$2,351,193
HOME			\$759,767
ESG			\$76,021
HOPWA			\$34,234

FINDING OF NO SIGNIFICANT IMPACT

The City of Cincinnati has determined that the projects will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at the City of Cincinnati Department of Community and Economic Development, 805 Central Avenue, Suite 700, Cincinnati, Ohio 45202 where ERR can be examined and name and address of other locations where the record is available for review and may be examined or copied weekdays 9 a.m. until 4 p.m. The ERR may also be requested via e-mail at communitydevelopment@cincinnati-oh.gov or via phone at (513) 352-6146. Hard copies and / or electronic copies will be sent as requested.

PUBLIC COMMENTS

The City of Cincinnati will undertake the projects described above with entitlement funds from the U.S. Department of Housing and Urban Development (HUD), under Title 1 of the Housing and Community Development Act of 1974. An Environmental Review Record for the projects has been prepared by the City of Cincinnati which documents the environmental review of these projects. The Environmental Review Records are on file at the City of Cincinnati Department of Community and Economic Development, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202. The ERR may be requested via electronic-mail at CommunityDevelopment@Cincinnati-OH.gov or via phone at (513) 352-6146. Hard copies and / or electronic copies will be sent as requested. Any individual, group, or agency disagreeing with this determination or wishing to comment on the project(s) may submit written comments to the City of Cincinnati via electronic-mail at communitydevelopment@cincinnati-oh.gov or directly to the U.S. Department of Housing and Urban Development Columbus Field Office via electronic-mail at CPDColumbus@HUD.gov. Comments should specify which Project is being addressed.

RELEASE OF FUNDS

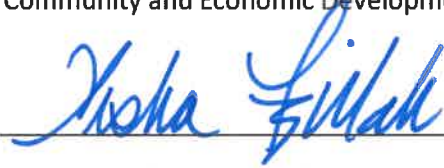
The City of Cincinnati certifies to HUD that the City consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process. The City further certifies that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under the National Environmental Policy Act of 1969 (NEPA), and related laws and authorities and allows the City of Cincinnati, Ohio to use the Community Development Block Grant, HOME Investment Partnerships Program, Emergency Solutions Grant, and Housing Opportunities for Persons With HIV/AIDS Funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the City of Cincinnati, Ohio certification for a period of **fifteen (15)** days following the anticipated submission date or its actual receipt of the request (whichever is later) only if the objections pertain to one or more of the following basis: (a) The certification was not executed by the Chief Executive Officer or other officer of the applicant approved by HUD; (b) The City of Cincinnati has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR Part 58; (c) the grant recipient has committed funds or incurred costs not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project or projects are unsatisfactory from the standpoint of environmental quality. Objection must be prepared and submitted in accordance with required procedure (24 CFR Part 58), and shall be sent via electronic-mail to HUD Columbus Field Office at CPDColumbus@HUD.gov. Potential objectors should contact HUD Columbus Field Office via electronic-mail to verify the actual last day of the objection period.

**THE COMMENT PERIOD FOR THIS PUBLIC NOTICE EXPIRES
FIFTEEN (15) DAYS FROM THE DATE OF PUBLICATION**

Aisha Tzillah, Community Development Administrator, RE Certifying Officer
Community and Economic Development Department



Note: The fifteen or eighteen-day public comment periods are the minimum time periods required by regulation prior to submission of a Request for Release of Funds and Certification (form HUD-7015.15) to HUD/State. The Responsible Entity may choose to allow a longer comment period. 24 CFR Part 58 requires, at Section 58.46, "Time delays for exceptional circumstances," a 30-day comment period for controversial or unique projects or those similar to projects normally requiring preparation of an Environmental Impact Statement. The fifteen-day objection period is a statutory requirement. The objection period follows the submission date specified in the Notice or the actual date of receipt by HUD/State, whichever is later.

Following completion of the comment period recipients may FAX the form HUD-7015.15 to HUD/State together with a copy of the public notice and a cover letter stating whether comments were received and, if so, how the recipient responded to the comment. The Request for Release of Funds and Certification should not be submitted before the recipient has responded. If the request is sent by FAX, the original signed form should be mailed to HUD/State. The date of receipt by FAX will be counted as the submission date. However, HUD will not issue the 7015.16 "Authority to Use Grant Funds" until after the original signed form is received.