



CITY OF CONCORD
New Hampshire's Main Street™
Community Development Department

REPORT TO MAYOR AND CITY COUNCIL

From: Timothy J. Thompson, AICP, Assistant Director of Community Development
Date: December 11, 2023
Subject: **Community Development Block Grant Application**
603 Legal Aid, Disability Rights Center NH, and NH Legal Assistance -
Feasibility/Planning Grant for creation of combined legal services hub for low-
moderate income and disabled clients (Community Justice Center)

Recommendation:

1. Accept this report.
2. Set the attached resolution for public hearing on July 8, 2024, authorizing the City to apply for, accept, and appropriate up to \$25,000 of Community Development Block Grants from the NH Community Development Finance Authority on behalf of 603 Legal Aid, Disability Rights Center NH, and NH Legal Assistance.
3. Set the attached resolution readopting the City's Anti-Displacement and Relocation Policy in support of the City's Community Development Block Grant application behalf of the 603 Legal Aid, Disability Rights Center NH, and NH Legal Assistance for public hearing on July 8, 2024.

Background:

The New Hampshire Community Development Finance Authority (NHCDFA) is the state agency responsible for administering the US Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program in New Hampshire.

Each year, the NHCDFA holds two CDBG application rounds, typically in January and July, to support housing and public facility projects that primarily benefit low- and moderate-income individuals and households. Types of CDBG grants available are as follows:

- Housing: This type of CDBG provides funding for the preservation and construction of affordable housing. Counties and non-entitlement communities, such as Concord, are eligible to apply for up to \$500,000 annually.

- Public Facilities: This type of CDBG provides funding for the construction of public facilities, such as water and sewer infrastructure, as well as other types of facilities including daycares, homeless shelters, and soup kitchens. Counties and non-entitlement communities, such as Concord, are eligible to apply for up to \$500,000 annually.

In addition to housing and public facilities, the NHCDFA also offers other types of Community Development Block Grants, on a rolling basis, as follows:

- Emergency Grants: These funds are available for projects to address emergencies and unanticipated events that have a serious and immediate threat to public health and safety, which primarily benefit low- and moderate-income people. Counties and non-entitlement communities, such as Concord, are eligible to apply for up to \$500,000 annually. Applications are accepted on a first-come, first-served basis throughout the calendar year.
- Feasibility/Planning Grants: These funds are available to conduct needs assessments, income surveys, preliminary architectural and engineering designs, cost estimates, and market analyses for potential CDBG projects, which primarily benefit low- and moderate-income individuals. Counties and non-entitlement communities, such as Concord, are eligible to apply for up to \$25,000 annually.
- Economic Development Grants: The City is also eligible to apply for up to \$500,000 in a calendar year to support economic development projects, which benefit low / moderate income persons. Such projects may include business loans, real estate development, infrastructure improvements, job training and similar activities. Applications are accepted on a first-come, first-served basis throughout the calendar year.

When applying for Community Development Block Grants, the City must, per CDBG rules, hold a public hearing prior to submitting its application.

In addition, to be eligible for CDBG funds, the City must also adopt:

- 1) An Anti-Displacement and Relocation Policy, which establishes procedures the City – or its subgrantees – must adhere to when expending CDBG funds to support projects which may involve temporary or permanent displacement of residents or businesses. This document must be readopted by the City Council for each individual CDBG application.

No displacement or relocation of persons or businesses is anticipated as part of this project.

- 2) A Housing and Community Development Plan. The purpose of this document, which is separate from the City's Master Plan, is to affirm that the City's goals relative to housing, economic development, and community development align with various NHCDFA and HUD requirements associated with the CDBG program. This plan must be readopted every three years.

The City last adopted this plan via Resolution #9264, which was approved on January 9, 2023. Therefore, no action is required by the City Council at this time.

The City has successfully applied for and received more than \$25 million in CDBG funds since the program's inception in 1974.

Discussion:

603 Legal Aid (603LA), Disability Rights Center-New Hampshire (DRC-NH), and New Hampshire Legal Assistance (NHLA) are New Hampshire's three civil legal services providers. They are the statewide, nonprofit law firms serving low and moderate income households, people with disabilities, and older adults. Their civil legal work helps their clients navigate challenges including housing, health care, safety from domestic violence, and education.

603LA, DRC-NH, and NHLA are all headquartered in separate locations in Concord (93 North State Street, 64 North Main Street, and 117 North State Street respectively). The 3 organizations are desirous of headquartering together, in a hub for civil legal services they are calling the Community Justice Center in Concord.

As noted in their request, the Community Justice Center hopes to optimize the experience for members of the public seeking help with civil legal problems by providing:

- A welcoming space for all with family-friendly design and features intended to promote accessibility for people with disabilities.
- Seamless connection with all available civil legal resources for people visiting in person.
- Maximizing coordination between 603LA, DRC-NH, and NHLA; already one another's closest partners, a shared space will further deepen our collaboration.
- Reduction of occupancy costs, allowing our organizations to serve more people.

The 3 organizations are seeking support from the City to apply for a CDBG planning grant of \$25,000 to hire an architectural firm to assess the space needs and requirements of each organization, develop a space plan and conduct site analyses of potential buildings and/or land for development, and acquire preliminary architectural and engineering designs and cost estimates.

If successful, the CDBG funding would potentially also be used to hire a consultant to assess the feasibility of and plan for a capital campaign to seek funding from individual donors, foundations and businesses.

The CDBG planning grant would allow the organizations to prepare to apply for CDBG Public Facility funding in the FY25 and will position themselves to pursue other public and private resources to reach the estimated total project cost of \$4,000,000 - \$6,000,000.

The City's Community Development Advisory Committee (CDAC) met on May 22, 2024 to review the Community Justice Center proposal and unanimously recommended that the City Council authorize the City Manager to apply for \$25,000 of CDBG Feasibility/Planning Grant funds available to support this project. Should City Council support this proposal, the CDBG application would be filed in as soon as possible, utilizing the services of the City's CDBG consultant Donna Lane.