



Community Development Block Grant (CDBG)

Annual Action Plan Program Year 2019

City of Manhattan
Community Development Department
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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Manhattan was identified as an Entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program in 2010.

In order to be compliant with the CDBG Entitlement requirements, the City of Manhattan has prepared and presented an approved Consolidated Plan and will update this plan every five years. This Plan fulfills the application and reporting requirements for the City of Manhattan and contains a Strategic Plan describing the goals the City will focus on as an Entitlement City; an Annual Plan that describes specifically the projects and budgets for which the yearly allocation will be used, and includes the Citizen Participation Plan and any updates.

The Plan also summarizes projects and activities that address needs for Low to Moderate Income (LMI) persons and neighborhoods, which include Public Service activities and Facility and Infrastructure improvements.

This is the City of Manhattan's CDBG Program Year 2019 Annual Action Plan (AAP), and addresses the time period beginning July 1, 2019 through June 30, 2020.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

HUD determines the annual allocation of CDBG funds through a formula comprised of several measures of community need, including the extent of poverty, population, housing overcrowding, age of housing, and population growth lag in relationship to other metropolitan areas. Through citizen participation, public hearings, and consultations with various organizations, groups, and agencies during the formulation of the 2015-2019 Consolidated Plan, the City determined that the five overall objectives for meeting the identified housing and community development needs are:

1. Sustain affordable housing opportunities by preserving the existing housing stock and supporting the creation of affordable permanent housing in standard condition.
2. Improve the livability and safety of neighborhoods through infrastructure improvements.
3. Support community facilities that improve the quality of life for low and moderate income residents.
4. Support public services that meet the needs of low and moderate income persons and families.
5. Support activities that create and sustain employment and quality jobs.

These priorities and objectives are set forth in the Strategic Plan and satisfy three statutory program goals, which are: Provide Decent Housing, a Suitable Living Environment, and Expanded Economic Opportunities, with primary benefit to low- and moderate-income residents. The Strategic Plan

confirms that proposed projects are in line with national CDBG Program Objectives related to low and moderate income benefit.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In the first nine years as an Entitlement Community under the Community Development Block Grant (CDBG) Program, the City's total allocation was over \$5.3 million. The City has had no difficulty in identifying projects for which the funds were to be used. The City has used its annual allocations for projects that include improvements to parks and public facilities, streets, sidewalks and ADA accessibility. Allocations have been used for housing rehabilitation, emergency and accessibility improvements for LMI-owned single family homes, and improvements to non-profit agencies' facilities that aided seniors, the homeless, and the abused. Public services support addressed homelessness prevention, housing and credit counseling, landlord/tenant counseling, child abuse, and disability support services.

Through the application of its annual allocations, the City has achieved 4 of the 5 goals in the Strategic Plan. Unfortunately, no opportunity to support activities that create or sustain employment and jobs has presented itself, but this goal has been maintained for the 2015-2019 Consolidated Plan years. The City has been diligent in meeting the requirements for compliance with national goals and objectives and 100% of persons served by the City's use of funds to date are LMI.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Manhattan's citizen participation process involves citizens in decisions that directly affect their lives. The Citizen Participation Plan (CPP) encourages full and proper citizen participation at all stages of the planning process and designates the structure, procedures, roles and policies to be followed by program participants and are consistent with federal requirements for the CDBG Program and the Section 108 Loan Guarantee Program. While the City is restricted by Kansas Cash-Basis Law from using the 108 Program, it is still a viable alternative to third party developers who may have a desire to fund economic or housing developments.

To achieve the purposes of the Citizen Participation Plan's (CPP), the City uses the five objectives in the Consolidated Plan, and combined recommendations from local agency consultations and local citizens to develop 5 broad descriptions of project categories that the City should address. The broad projects can be categorized as:

- Housing Rehabilitation,
- Public Services,
- Public Facilities,
- Neighborhood Infrastructure, and
- Administration and Planning

As part of community engagement for the CDBG 2019 AAP planning process, the City opened a “suggestion box form” on the City’s website from October 21, 2018, through December 7, 2018. The “Suggestion Box” listed eligible project categories for funding and provided a way for citizens to submit suggestions online in addition to, or in place of, attending the Public Input meeting held on November 8, 2018.

After a 30 day Public Review of the Plan was completed, it was presented to the City Commission for approval. The City’s submission deadline each year is May 15th, which is 45 days before the annual start of the CDBG Program Year on July 1st. The 2019 allocation announcement was delayed until April 22, 2019, and the City was unable to finalize the 2019 AAP draft to a sufficient level to begin the normal public review period of 30 days before the submission deadline of May 15th. The City therefore took advantage of the waiver listed in the HUD Notice: CDP-19-01 issued on February 13, 2019, on pages 3 and 9 of the Guidance on Submitting Consolidated Plans and AAPs for Fiscal Year (FY) 2019, which authorizes the late submission of the Annual Plan. This allows the City to begin its grant year on July 1 as usual, and to incur pre-award costs for activities which are included in the 2019 AAP, so long as the Citizen Participation Process and Public Hearing have been completed, and the 2019 AAP is submitted to HUD by June 21, 2019. This will allow for the efficient and timely performance of all activities identified in the 2019 AAP, and all expected expenses are included in the 2019 AAP and will not affect future grant allocations.

From the suggestions submitted, the 2019 AAP draft was completed, and a 30 day public review period began on May 7, 2019, and public hearing was held on May 21, 2019, seeking public comment and input before the plan was submitted to the City Commission for approval. The public was notified of the meeting using a variety of means including the local newspaper, local cable channel, the City's "In Touch" email notification system, the City’s website, and social media. The draft of the CDBG 2019 AAP was posted on the City's website and copies were available for review at the Manhattan Public Library. Additionally, the City made a reasonable number of free copies available to citizens upon request. No one attended the Public Hearing.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Suggestions and comments regarding the 2019 Annual Plan were received from the public through the online suggestion box form, by phone, or email. The Suggestion Box form listed only general Project Categories as identified by CDBG rules and invited respondents to pick a category and then describe their proposed project. Six individuals used the online suggestion box form to provide recommendations for the use of funds, 2 people used direct e-mail providing 2 additional requests, and 3 others submitted their ideas through a phone call.

The Public Input Meeting was held as part of the Citizen Participation planning phase for the 2019 AAP. No one attended the meeting due to inclement weather, and all suggestions that were received throughout the consultation process were provided through other means. The suggestions and comments received from all sources are as follows:

Public Services goals: Recommendations included support for expanded shelter services and outreach to homeless; a program for ADA modifications for vehicles; support was expressed for a dedicated meal

site for homeless and extremely LMI, and childcare services; and additional and affordable child care services.

Housing Rehabilitation: In addition to the Rehabilitation Program, attendees discussed ways that funds might be used to expand the availability of affordable housing stock in the City, including updates to Public housing and development of housing for LMI single parents; investing in a “Land Trust/Housing Trust”, and conducting a housing study to evaluate the type of housing most needed.

Infrastructure Projects: Recommendations were made for many and various sidewalk projects, ADA improvements, bicycle and pedestrian traffic crossing improvements, and improved connections for LMI areas, including improvements to access the Linear Trail, as well as installing covered Bus Shelters with benches in LMI areas. Other suggestions included Tree Planting, and increasing the number of Bicycle lanes.

Public Facility Projects: Suggestions included support for renovations to the Area Agency on Aging building, a new Crisis Center Shelter, upgrade to the Douglass Center Annex building and the Flint Hills Breadbasket, and the parking that is shared by these two facilities. Other facilities suggestions included a shelter house for Homeless youth, and demolition for conversion of abandoned and neglected properties. Once again a suggestion was received for a Senior Center located on the West edge of the City, however this is not in an LMI area.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments or views were accepted, including projects ineligible for CDBG funding. All proposed projects were sent to the appropriate departments for consideration in future planning.

7. Summary

In early 2017, per HUD Notice CPD-17-06 recommendations, the City undertook a review of the Citizen Participation Plan (CPP) to ensure that a policy establishing processes in the event of a Federally Declared Disaster were included. The City eventually adopted an amendment to the CPP that incorporated changes to the Public Participation Process that expedites Substantial Amendments and added a section to the CPP titled “Federally Declared Disasters” which outlines a process if the City were to be awarded CDBG-DR funds. Throughout 2018 and 2019, the City has been collaborating with a number of agencies to improve the disaster resiliency of Manhattan and Riley County.

The City will continually strive to address the greatest needs as presented by the citizens of Manhattan, through consultations with key stake holders, and City Administration. Some identified needs may be included in the City’s Capital Improvements Plan and addressed through other funding sources.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MANHATTAN	Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The City of Manhattan is the Responsible Entity and the lead agency. The City's Community Development Department will administer the program which includes the development of the Consolidated Plan and yearly Annual Action Plans, administration of all projects and programs proposed in each year's Annual Plan, and oversee any Section 108 Program applications on behalf of third parties.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City began consultations with key stakeholders early in the 2018 CDBG grant year to determine the needs to be addressed in the Program Year (PY) 2019 AAP. Consultations were held with several agencies including the Manhattan Housing Authority, Manhattan Area Housing Partnership, Inc., Manhattan Emergency Shelter, Inc., the Crisis Center, Inc., Housing and Credit Counseling, Inc., and many others. Input was requested at the Riley County Council of Social Service Agencies' (RCCSSA) monthly meeting. This is a collaboration of local, county, state, federal, and non-profit agencies which meet to discuss and identify the most important public events, issues and needs for the City of Manhattan. The City Parks and Recreation Department, Public Works Department, and the Fire Department assisted in identifying public facility needs to be addressed for LMI areas and beneficiaries.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

Every month, agency representatives of the RCCSSA, that provide services to Manhattan and area citizens meet to discuss and coordinate activities. Representatives discuss needs and provide feedback to members and network for greater efficiency. Additionally, the City of Manhattan funds Social Services agencies through locally collected funds that are managed by the Social Services Advisory Board to address issues related to the needs of Low to Moderate Income (LMI) persons and families. Member agencies serve seniors, children, abused children and adults, domestic violence victims, the homeless, hospice services, or provide support or legal advice to LMI residents. For 2019, the City Commission allocated \$447,117.00 in local funds to eleven agencies based on recommendations from the Social Services Advisory Board (SSAB), a member group of citizen volunteers.

Early in 2017, a group called the Flint Hills Wellness Coalition was formed to address multiple issues regarding health and wellness, and has created a one-stop shop for community service in Manhattan and Riley County. The website, called the *Manhattan Information Directory: A Guide to Everything* (MIDGE), is a year old and continues to be populated and updated. Its ambition is to be the most complete source of information about available community services and events.

In 2014, the City collaborated with the Manhattan Housing Authority on a HUD Capital Fund Emergency Grant which removed mold and asbestos from Apartment Towers, the oldest low income housing structure in Manhattan. In late 2017, the City collaborated with the MHA to secure funding to complete other needed improvements discovered during the initial renovations, including sewer line repair and window replacement. All improvements were completed in November of 2018, and MHA is in the process of re-leasing the apartments.

The City has typically waived building permit and inspection fees and occasionally water/sewer connection fees for the Manhattan Area Housing Partnership, Inc. (MAHP, Inc.), a local Certified Housing Development Organization (CHDO). MAHP Inc continues to work to secure funding to build additional affordable housing for families and seniors within the City limits.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City is part of the Kansas Balance of State Continuum of Care (CoC) which receives and manages Emergency Solutions Grant (ESG) funds from the Kansas Housing Resources Corporation (KHRC). The City collaborates with the Manhattan Emergency Shelter, Inc. (MESI) and The Crisis Center to pass through State provided ESG funding for their programs and operations.

In 2006, MESI began collaborating with the Affordable Housing Task Force whose mission was to promote safe, affordable and accessible housing options through collaboration, advocacy, strategic planning and awareness. The Task Force included local agencies that worked to get a clear picture of the housing needs for Manhattan and to develop feasible alternatives from available resources. The Task Force identified two priority needs for the City:

- Support the expansion of the homeless service system to include homeless prevention and re-housing programs and supportive housing programs for the disabled and families
- Promote collaboration among service providers, including public housing agencies, to improve access to affordable housing and expansion of supportive services.

From this effort, the Manhattan Emergency Shelter was built in 2008, permanent housing programs were started (2009/2010), existing housing was renovated, and new affordable housing was built. Affordable housing development continues through the efforts of the Manhattan Area Housing Partnership, Inc.

Eventually, the Task Force became inactive, and a new committee, “Everybody Counts”, was formed. Everybody Counts, operating under the auspices of the Riley County Council of Social Service Agencies (RCCSSA), functions in the same way the Task Force did and provides the same input for the community. The group, represented by school district representatives, social service agency staff, religious leaders, community leaders, and volunteers, looks at issues related to homelessness and other issues of poverty. “Everybody Counts” holds an annual event that allows local citizens free access to direct health services (medical, dental, mental health, vision, hearing, diabetes, etc.); and offers information about the community’s social services safety net. The next event is being planned for August 2019.

MESI operates the Caroline Peine Transitional Shelter which is a 47 bed emergency shelter for homeless men, women, and families. It offers placement in transitional and permanent supportive housing, and homeless rental assistance to either decrease the current length of homelessness or to prevent a family from becoming homeless and entering shelter. MESI does not set aside specific beds in the shelter for the chronically homeless, but houses them as needed. MESI also houses individuals through two ESG funded CoC Programs: Transition in Place Program, and the Opportunities Program.

The Transition in Place Program provides support to homeless families with dependent children who have extreme housing barriers, such as a pregnant mother with young children or a family that owes rental arrears preventing them from qualifying for Public Housing. The Opportunities Program provides shelter to individuals with Severe and Persistent Mental Illness and who are homeless.

Since its inception, MESI’s Homeless Prevention and Re-housing Program Extension (HPRPE) has assisted with housing stabilization by integrating the program into shelter services to prevent and divert clients

from entering shelter, and connect them to the most applicable services to resolve their immediate crisis situation. One piece of MESI's Homeless Rental Assistance Program (HRAP) offers homelessness prevention services to households in imminent risk of homelessness, which is funded through a combination of CDBG and ESG funds.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Manhattan does not have Entitlement Status for the Emergency Solutions Grant and does not directly receive federal ESG funds. The City acts as pass-through for State provided ESG funds allotted to The Crisis Center and the Manhattan Emergency Shelter, Inc. (MESI). These agencies determine which of their essential services require funding and annually submit their applications for the funds to the City, which compiles the applications and submits them to the Kansas Housing Resource Corporation (KHRC) for consideration of funding. In April 2019, the City of Manhattan, the Crisis Center, and the Manhattan Emergency Shelter, Inc. were all monitored for the 2018 grant year by KHRC and there were no findings. All performance standards and evaluation outcomes; policies and procedures are determined and monitored by KHRC.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MANHATTAN HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Services - Housing Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Homelessness Strategy Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Manhattan Housing Authority (MHA) was consulted through individual meetings and email. MHA representatives also provided suggestions during the Public Input phase of the planning process. The City collaborates with the MHA to improve the quality of public housing and promotes Fair Housing issues through co-sponsoring the annual Fair Housing Seminar.
2	Agency/Group/Organization	MANHATTAN EMERGENCY SHELTER
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration met with the Director and the Finance Officer of the Manhattan Emergency Shelter, Inc. at the Caroline Peine Transitional Shelter. The City will continue to collaborate with MESI on the Emergency Solutions Grant (ESG) Program, and provide support for Homelessness Prevention.
3	Agency/Group/Organization	Sunflower CASA Project, Inc.
	Agency/Group/Organization Type	Services-Children Services - Victims Child Welfare Agency Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration met the Director at Sunflower CASA Project Inc. (CASA) in regards to children who victims of abuse or neglect. The City and CASA will continue to work together on identified projects assisting abused children and their non-offending caregivers.
4	Agency/Group/Organization	Manhattan Area Housing Partnership, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Community Housing Development Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted via email with the Director of the Manhattan Area Housing Partnership, Inc. (MAHP) which provides low income tax credit housing and provides services to clients who are disabled. MAHP also collaborates with MESI to provide transitional housing to homeless persons. The City will continue to support the development of Low Income Housing through MAHPs tax-credit applications and other means.

5	Agency/Group/Organization	CRISIS CENTER
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted via multiple means with the Director of the Crisis Center in Manhattan to determine housing and other needs for victims of Domestic Violence. The Crisis Center also operates a shelter for victims who must leave their homes. The City will continue to collaborate with the Crisis Center on the Emergency Solutions Grant (ESG) Program, and in 2018 conducted a planning study to determine the needs for additional shelter space. The outcome will provide a building design concept that the Crisis Center will use for fund raising to construct the new shelter.
6	Agency/Group/Organization	Housing and Credit Counseling, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Education Service-Fair Housing Regional organization HUD Certified Housing Counselor
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Housing & Credit Counseling, Inc. (HCCI) was consulted in a meeting with the President/CEO of HCCI, and through e-mail. HCCI's counseling is important for consumer credit education, home ownership education, and Landlord/Tenant counseling as part of the homeless prevention and anti-poverty strategies. HCCI collaborated on the City's Annual Fair Housing Seminar and the City will continue to work with this agency to educate clients on their rights and responsibilities.

7	Agency/Group/Organization	Kansas Legal Services, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Employment Service-Fair Housing Services - Victims Regional organization Legal services for LMI clients
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted with the Managing Attorney for Kansas Legal Services' (KLS) Manhattan office via a variety of means. KLS, Inc. provides legal services and advice to LMI individuals and families regarding any matter tried in Civil Court.
8	Agency/Group/Organization	Pawnee Mental Health Services, Inc.
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-Health Service-Fair Housing Health Agency Publicly Funded Institution/System of Care Regional organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted with the Pawnee Mental Health staff via a variety of means. Pawnee provides a variety of services to individuals requiring assistance because of mental health issues.
9	Agency/Group/Organization	Manhattan-Ogden USD 383
	Agency/Group/Organization Type	Services-Children Services-Education Publicly Funded Institution/System of Care State Public School District
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted with USD 383 staff via various means. USD 383 provides a variety of services to unaccompanied youth and families in transition that require assistance.
10	Agency/Group/Organization	Riley County Health Department
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Child Welfare Agency Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Child care services

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City Administration consulted with the Riley County Health Department Director via various means. The Riley County Health Department provides a variety of services to residents and families in the City and throughout Riley County, and was most interested in developing affordable child care options for LMI families. The Health Department is also one of the sponsoring agencies for the Flint Hills Wellness Coalition and is involved in the development of a one-stop Website that will list links to agencies and resources for assistance.
11	Agency/Group/Organization	Topeka Habitat for Humanity, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Manhattan Area Habitat for Humanity (MAHFH) is a Branch of the Topeka Habitat For Humanity. City Administration began consultation in 2018 with MAHFH via email and face-to-face with the local Director when MAHFH began providing volunteer assistance to complete low cost, non-specialized housing rehab services to clients with projects that are smaller in nature than the City Rehabilitation Program. MAHFH also constructs housing for qualified Low income families, on a case by case basis. MAHFH has also referred clients to the City when the projects were large and complex, or involve lead and/or asbestos abatement.

Identify any Agency Types not consulted and provide rationale for not consulting

All relevant agency types involved in developing and implementing the 2019 Annual Plan were consulted in some capacity.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Kansas Statewide Homeless Coalition	The Kansas Statewide Homeless Coalition (KSHC) Balance of State (BOS) is the lead agency for the Continuum of Care (COC) for the 101 counties that do not have Entitlement status. The Director of MESI is the local contact for the Manhattan COC and was consulted concerning the goals to address homelessness and to ensure consistency with the Strategic Plan.
Capital Fund Program - Five Year Action Plan	Manhattan Housing Authority	The Manhattan Housing Authority (MHA) is the local public housing agency designated by HUD. The MHA was consulted to assess the needs and opportunities for low income housing.
Manhattan Community Needs Assessment	City of Manhattan	The City of Manhattan completed the Community Needs assessment, which was designed to gain insights from the community for the purposes of planning and community development to identify levels of need and satisfaction with services and infrastructure, including housing, transportation, and others.
Manhattan Urban Area Comprehensive Plan & MATS	Manhattan City, Riley County, and Pottawatomie County	The Manhattan Urban Area Comprehensive Plan defines the vision for future growth and development across the Manhattan area, and establishes goals, policies and actions. It was developed in a joint planning initiative by the City of Manhattan along with Riley and Pottawatomie counties over a 15-month period involving an extensive and highly collaborative public process. This updated Plan extended the planning area to 93 square miles, and to identify new and expanded growth areas in the two counties. The Plan was adopted by City, and Riley and Pottawatomie counties. The process also included an update to the 2000 Manhattan Area Transportation Strategy (MATS), which focuses on a broad range of multi-model transportation issues. This plan is reviewed annually and updated as needs are identified.
Manhattan Strategic Facility Improvement Plan	Parks & Recreation Department, City of Manhattan	The Parks and Recreation Strategic Facility Improvement Plan provided a comprehensive look at Manhattan's recreation facilities and programs. The plan evaluates existing indoor and outdoor recreation facilities, assesses the community's needs for improved places to play, and proposes strategies to enhance existing (or possibly build new) sport courts, fields and gyms that the entire community will benefit from.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Greater Manhattan Project	Manhattan Chamber of Commerce	Supported by the "Power Our Potential" initiative of the Manhattan Area Chamber of Commerce's Advantage Manhattan economic development plan, the Greater Manhattan Project will bring the community together behind a consensus vision for a sustainable and equitable future for the Central Flint Hills region, to address affordable housing, mental health and other medical needs, transportation and economic development.
Multi-Hazard, Multi-Jurisdictional Mitigation Plan	Riley County Emergency Management & Pottawatomie Emergency Management, Manhattan City Departments	This is the Hazard Mitigation Plan for Homeland Security Region I in Kansas, for coordination in the Event of a Disaster. The City, Riley County, Pottawatomie County, and the City, with other local, state and federal agencies are undertaking a review of procedures in the event of a Federally declared disaster, to determine most efficient responses to Urgent Needs.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City identifies needs and receives suggestions from the public, local agencies, non-profits and local neighborhood groups on an ongoing basis. Suggestions are considered for eligibility at the start of the planning period and eligible suggestions and needs are used to identify projects for each annual action plan program year.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Plan (CPP) encourages and ensures full and proper participation of citizens in decisions that directly affect their lives, at all stages of the Consolidated Plan process. To achieve this purpose, five objectives guide the basic standards by which proper citizen participation will be measured, and are consistent with federal requirements for the CDBG Program. The City will:

- Provide for and encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income, including non-English speaking residents.
- Provide citizens with reasonable and timely access to local meetings, information and records.
- Provide for public hearings to obtain citizen's views and to respond to questions at all stages of the consolidated planning process.
- Provide for technical assistance to groups representative of persons of low-and moderate income that request assistance in developing proposals.
- Provide for a timely written answer to written complaints and grievances regarding the Consolidated Plan.

The City conducts a 7-week long Public Input process and public meeting during the planning phase to solicit suggestions for the grant program year, and a 30 day Public Review and Public Hearing once the draft AAP is completed, before the plan is submitted to the City Commission for approval each year. The City will hold Public Meetings to discuss any projects that have neighborhood specific impact to provide opportunities to discuss planned projects and gain feedback. The CPP also includes a Section 108 Loan Guarantee Application process and a Substantial Amendment process. The City has undertaken a review of local disaster plans that address various potential disasters, and incorporated a citizen participation process in the event of a disaster, and modified the CPP accordingly.

The City notifies the public of meetings through a variety of means including various social media tools, newspaper ads, news releases, local cable channel, local radio interviews, and the City website which has a "Translate Page" option that converts documents for non-English speakers. All documents are posted on the City's website, provided to the Manhattan Public Library, and free copies of plans are available to citizens upon request.

These guidelines were used to involve the community in the planning process during the Public Input phase of the 2019 AAP. The Public Input meeting was held on November 8, 2019. For a period of approximately 7 weeks that included the Public Input Meeting, the City also provided an electronic "Suggestion Box" form on the City Website and encouraged residents to submit suggestions. The City combined all sources of recommendations to identify projects that the City should address.

Once the 2019 Plan draft was completed, a 30 day Public review period began on May 7, 2019, ended on June 6, 2019, and a Public Hearing was held on May 21, 2019. Public comment and final input was incorporated before it was submitted to the City Commission for approval and submission. The Public was notified of the hearing again through a variety of means identified above.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The Public Meeting held on November 8, 2018 was attended by no one due to inclement weather.	No comments were received at the meeting, however comments were submitted by phone, email and electronic suggestion box.	All Comments were accepted; some were ineligible projects for CDBG, but were forwarded to the appropriate departments for consideration in future planning.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A newspaper ad promoted the Public Input meeting and the opportunity to submit suggestions on-line using the suggestion box form. No one attended the meeting, 6 people submitted on-line suggestions, and 2 others were e-mailed. Three were phoned in. Another newspaper ad publicized the 30 day review of the draft 2019 Annual Action Plan and the Public Hearing that was held on May 21, 2019.	Same as above.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Electronic Suggestion Box	Minorities Non-English Speaking - Specify other language: City webpage has a translate button for a number of languages Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	6 people submitted on-line suggestions. Suggestion box submissions with a particular urgency were forwarded to appropriate departments to be addressed immediately.	Same as above.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Korean, Spanish and others available through on-line translator</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Residents signed up on the City's e-mail notification system. The entire CDBG webpage can be converted to a multitude of languages using the on-line translator. The Public Input Period, the Citizen Participation Plan Amendment, and the draft 2018 Annual Action Plan were all publish on the webpage, and advertised through the notification system and other City Social media.</p>	Same as Above.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The 30 day Public Review for the PY 2019 AAP began May 7, 2019 and the Public Hearing was held on May 21, 2019. Citizen engagement was encouraged through the ways outlined in the CPP, however only City employees attended.</p>	<p>One comment was received via email that said the PY 2019 Annual Action Plan looked good.</p>	<p>All comments were accepted.</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The following table displays the anticipated resources to be allocated to projects and activities within the City of Manhattan. CDBG PY 2019 will start on July 1, 2019 and the allocation amount announced on April 22, 2019, was \$556,213.00. The only source of Program Income may come from Housing Rehabilitation grant recipients reimbursing the program because they wish to exit the terms of the grant. The City anticipates that some prior year (2018) funding will be consumed by 2019 grant projects. The actual allocated amounts for each Annual Action Plan program year to date, are listed. This is the final year of the current 5-year Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	556,213	0	88,165	644,378	0	PY2019 Allocation and estimated prior year resources that will be used in 2019. Program Income is not anticipated, but is typically used in Housing Rehabilitation Activities.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City does not require matching funds, however opportunities to leverage funds do occur and the City has procedures in place to manage external matching funds. While federal funds will be used to help LMI single family home owners undertake home repairs designed to preserve the safety and livability of their structures, the City has procedures in place for individual homeowners who wish to contribute to the rehabilitation of their homes. Other entities (City departments, private organizations and private individuals) have on occasion provided matching funds for projects when the costs of proposed projects are greater than the CDBG funds budgeted.

In conjunction with donations from private, local and other agency fundraising, federal funds will be used to provide Public Services assistance to meet the needs of as many “presumed benefit” and LMI populations as possible. All of the Public Service agencies funded to date have provided a match in some amount. CDBG funds will be targeted at LMI areas to improve local public infrastructure and may serve as match in conjunction with local, state or federal dollars to improve or create new access for LMI neighborhoods and citizens.

The City will also use allocated 2019 funds to improve neighborhood accessibility through ADA improvements and improved neighborhood connections, historic preservation, or reconstruction of infrastructure. While CDBG funds may be used to create or preserve jobs for LMI persons, there are currently no projects planned that address that goal.

The City operates under several disaster plans, some developed in conjunction with Riley County, that address specific disaster events that include tornados, flood and levee failures, failure of Tuttle Creek Lake Dam, and ice storm events. In these instances, the City intends to use other avenues of Federal assistance to address these potential disasters, and will only Substantially Amend the 2019 AAP if needed. The City has undertaken a review of these disaster plans, and on September, 2018, participated in a table top exercise with area partners in Riley County, Pottawatomie County, and other local, state, and federal agencies to identify areas of improvement, and determine appropriate actions to take after any potential event. Federal and State funds are routinely leveraged by the City, Riley County and the surrounding region for training and equipment to be better prepared for a disaster.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City owns several parks, buildings and public squares that may be able to meet the needs identified during consultation meetings. The City has on occasion, repurposed buildings and available spaces to meet needs as identified by various stakeholders. The Flint Hills Breadbasket and the Senior Center are City-owned buildings leased at no charge to local groups to meet community needs. Another such building includes the historic Community House building that the City has reviewed for possible redevelopment in conjunction with private funds. However, ADA improvements must be made inside and outside the building before this goal can be pursued. A 30% Construction cost study was completed in Program Year 2016 that estimated costs to make the building ADA accessible, and the report was provided to City Administration and the Kansas State Historic Preservation Office.

Two buildings in Manhattan City Park are being assessed for conversion to programmed space for Special Populations education.

City-owned Douglass Park will be utilized for construction of a new indoor recreation complex that would serve several LMI neighborhoods.

Discussion

One facility need mentioned during the consultation process for previous program years included neighborhood recreation centers, developed from the Manhattan Parks and Recreation Department 2015 Strategic Facility Improvement Plan (SFIP), which assessed recreation facilities available to the various neighborhoods in the City. The SFIP recommended that the City create three new multiple use recreation facilities, one of which would be located in and serve several LMI neighborhoods located within the oldest parts of Manhattan. The City then conducted a study to determine the subsequent size and uses of a recreation facility, which ultimately resulted in the submission of an application to the Section 108 Loan Guarantee Program in 2016 for financing to construct the SENRC. The Application was approved in February 2017, and construction was to begin late 2019. However, a conflict between the Kansas Cash Basis Law and Section 108 rules resulted in the City withdrawing from the Section 108 Program. The City continues to assess Douglass Park for a new recreation center that meets the needs of the neighborhood as expressed by the steering committee. Although construction has been delayed due to these unexpected circumstances, the City ultimately expects that this facility will be constructed with funds from local sources.

ADA improvements and sidewalks in LMI neighborhoods that also serve as connections to bike trails or to public facilities serving LMI populations are also some of the possible improvements identified to improve livability in LMI neighborhoods. In PY 2018, the City identified needed sidewalk and trail connection improvements that were later included with other potential LMI neighborhood connections. There were not sufficient funds to cover all locations, so this funding will be rolled into a larger 2019 project that will address several locations.

The 2014 modernization activities at the MHA's Apartment Towers were delayed as other issues with the building were identified and additional funding sources pursued. The City entered into an agreement with the MHA to fund the additional improvements and all renovation efforts were completed by late 2018.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Administration	2015	2019	Grant Administration, Planning, and Fair Housing	City of Manhattan	Administration	CDBG: \$111,038	Other: 0 Other
2	Housing Rehabilitation	2015	2019	Affordable Housing Non-Homeless Special Needs Homeless Prevention	City of Manhattan	Housing Rehabilitation	CDBG: \$177,550	Homeowner Housing Rehabilitated: 9 Household Housing Unit
3	Public Services	2015	2019	Homeless Non-Homeless Special Needs Presumed Benefit populations	City of Manhattan	Public Services	CDBG: \$83,325	Public service activities other than Low/Moderate Income Housing Benefit: 129 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 22 Households Assisted Homelessness Prevention: 51 Persons Assisted
4	Public Facilities	2015	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development	City of Manhattan	Public Facilities	CDBG: \$49,300	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4112 Persons Assisted
5	Neighborhood Infrastructure Improvements	2015	2019	Non-Homeless Special Needs Non-Housing Community Development	City of Manhattan	Neighborhood Infrastructure Improvements	CDBG: \$233,165	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15660 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Administration
	Goal Description	Administration activities included administration of CDBG projects and activities, Fair Housing activities, and planning activities, and filing of federal reports as well as conducting reviews of policies and processes, and implementing them as needed.
2	Goal Name	Housing Rehabilitation
	Goal Description	Housing Rehabilitation includes the management and completion of the following three activities, Comprehensive Rehabilitation, Emergency & Accessibility Rehabilitation, and Mobile Home Emergency & Accessibility Rehabilitation. These are conducted to maintain and preserve availability of affordable owner-occupied housing stock, improve safety, livability, and accessibility of homes, and to help stabilize neighborhoods.
3	Goal Name	Public Services
	Goal Description	Public Services activities include any service which benefits a low to moderate income persons or presumed benefit populations to prevent homelessness, increase self-sufficiency and provide counseling. In Program Year 2019, this will include homeless prevention services, mental health services, legal services, consumer credit counseling as well as Landlord/Tenant counseling, and services for abused children and their non-offending caregivers.
4	Goal Name	Public Facilities
	Goal Description	Public Facilities Improvements include renovations and improvements to any facility, such as parks, buildings or public use structures that serve a LMI area or clientele.
5	Goal Name	Neighborhood Infrastructure Improvements
	Goal Description	Neighborhood Infrastructure Improvements include any project that improves access, connectivity, and livability for LMI areas or LMI populations. Examples include filling sidewalk gaps, making ADA improvements, installation of street crossings or other neighborhood street improvements, and any other accessibility or connectivity improvement.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Manhattan proposes to undertake projects in the 2019 Annual Plan to benefit over 15,000 residents. Projects were selected in conjunction with HUD National Objectives and identified CDBG eligible activities. Each of the five projects has proposed activities that include needs identified by the community through a comprehensive consultation process.

Administration Project funds will be used to oversee CDBG program management, and Funds are set aside for a planning study for one of 3 possible studies. Administration will also be used to continue to educate citizens about Fair Housing practices.

Housing Rehabilitation Project funds will help preserve existing affordable housing for LMI populations. The program will offer three kinds of rehabilitation: Comprehensive (funding up to \$25,000 per home), Emergency and Accessibility (up to \$5,000 per home); and Mobile Home Emergency and Accessibility (up to \$2,500 per home). These activities are intended to make repairs necessary to maintain the safety and livability of structures and preserve existing affordable housing stock. Accessibility renovations are especially important to disabled individuals and the elderly.

The Public Services Project funds will be provided to agencies which provide support services to LMI individuals. The five programs supported address child abuse, homeless prevention, civil legal aid counseling, consumer credit counseling, and mental health services.

The Public Facility Project identified will be used to make various ADA improvements in public facilities around the City.

The Neighborhood Infrastructure Project involves Sidewalk/ADA issues that will improve accessibility and provide connectivity to services and amenities for LMI neighborhoods and persons with disabilities in various locations to be identified.

Projects

#	Project Name
1	Administration & Planning
2	Housing Rehabilitation
3	Public Services
4	Public Facilities
5	Neighborhood Infrastructure

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities for all of the projects and activities listed are based on information received during the consultation and planning process. The activities proposed to be undertaken were those most often mentioned by all participants and meet the objectives identified in the Strategic Plan.

This 2019 AAP provides a concise summary of the projects, activities, and actions that will take place this year to address the priority needs and objectives identified during the extensive consultation process. Generally these projects are broadly grouped together as affordable housing, infrastructure and connectivity improvements including transportation improvements, public facility improvements, and public services enhancements.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration & Planning
	Target Area	City of Manhattan
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$111,038
	Description	Administration activities will include administration of CDBG projects and activities, as well as administration of Fair Housing activities, and all required federal reporting.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Activities are entirely for Program Administration, Fair Housing, and Planning activities; and are not applicable to benefit requirements.
	Location Description	The program will be managed from the Manhattan City Hall, Community Development Department at 1101 Poyntz Avenue, Manhattan, KS.
	Planned Activities	Administration activities will include administration of Fair Housing and Planning activities, as well as administration of all other CDBG projects and activities; and includes the preparation of federal reports and ongoing review of federal policy and procedures to ensure compliance. Planning funds have been set aside to access needs for ADA and other improvements in public facilities.
2	Project Name	Housing Rehabilitation
	Target Area	City of Manhattan
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$177,550
	Description	Housing Rehabilitation includes project delivery and completion of the following three activities, Comprehensive Rehabilitation, Emergency & Accessibility Rehabilitation, and Mobile Home Emergency & Accessibility Rehabilitation LMI owner-occupied homes
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 9 LMI-owned single family homes will be rehabilitated to HQS standards, benefitting approximately 20 people.
	Location Description	Houses owned by LMI households that are within the City Limits at various addresses not in a flood hazard area.
	Planned Activities	Activities include Project oversight and delivery of Comprehensive Single Family home Rehabilitation, Emergency and Accessibility Rehabilitation, and Mobile Home Emergency and Accessibility Rehabilitation.

3	Project Name	Public Services
	Target Area	City of Manhattan
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$83,325
	Description	Public Services activities include any service which benefits low to moderate income persons or presumed benefit populations to prevent homelessness, increase self-sufficiency, and provide counseling.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 180 LMI or presumed benefit persons will be served by these activities.
	Location Description	All public services sub-recipients provide services within the City of Manhattan. Sub-recipients include: Housing & Credit Counseling, Inc., 1195, S.W. Buchanan St., Topeka, KS 66604; Kansas Legal Services, 205 S. 4th St., Suite G, Manhattan, KS 66502; Manhattan Emergency Shelter, Inc., 416 4th Street, Manhattan, KS 66502; Pawnee Mental Health Services, Inc., 2001 Claflin Road, Manhattan, KS 66502; Sunflower CASA Project, Inc., 115 N. 4th Street, Manhattan, KS 66502.
Planned Activities	In Program Year 2019, services identified will include homelessness prevention, mental health services, legal counseling, household budgeting and consumer credit counseling, Landlord/Tenant counseling, and services for abused children.	
4	Project Name	Public Facilities
	Target Area	City of Manhattan
	Goals Supported	Public Facilities
	Needs Addressed	Public Facilities
	Funding	CDBG: \$49,300
	Description	Public Facility Improvements include any project that improves access, and livability for LMI areas or LMI populations. Examples include making ADA improvements in buildings, improving accessibility for all populations, and installation of drainage improvements for public open spaces, and any other accessibility or facility improvement that increases the livability for LMI persons and neighborhoods.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 9,620 LMI persons of a variety of race, ethnicity, ability or family composition will benefit from these activities.
Location Description	All activities will be located in the City of Manhattan in facilities that serve LMI populations and Neighborhoods, or presumed benefit populations.	

	Planned Activities	Public Facility Improvements include any project that improves access and/or livability for LMI areas or LMI populations. Examples include making ADA improvements in buildings, improving accessibility for all populations, and installation of drainage improvements for public open spaces, and any other accessibility or facility improvement that increases the livability for LMI persons and neighborhoods.
5	Project Name	Neighborhood Infrastructure
	Target Area	City of Manhattan
	Goals Supported	Neighborhood Infrastructure Improvements
	Needs Addressed	Neighborhood Infrastructure Improvements
	Funding	CDBG: \$223,165
	Description	Neighborhood Infrastructure includes any project that improves accessibility and livability in LMI areas or for LMI populations, such as filling sidewalk gaps, making ADA improvements, and creating connectivity including for transportation.
	Target Date	12/31/2020
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 6,300 LMI persons in various neighborhoods will benefit from filling sidewalk gaps, making ADA improvements, and other accessibility or connectivity improvements.
	Location Description	Improvements to infrastructure will occur in areas of the City where ADA access or connections for LMI neighborhoods is lacking.
	Planned Activities	This project will make Sidewalk/ADA/Trail connections for LMI Neighborhoods or persons with disabilities in the City of Manhattan. The activity will install ADA improvements to sidewalks and fill the sidewalk gaps, and link LMI Neighborhoods to local amenities.

Project Summary Information

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

All projects and activities will occur within the City limits. Area benefit projects will be confined to areas identified by the 2010 Census as LMI Census Tracts and/or block groups. Housing rehabilitation efforts can occur anywhere in Manhattan excluding flood zones as long as the household is LMI. Public Services benefit LMI individuals that are residents of Manhattan. Public Facilities and Neighborhood Infrastructure improvements will occur in LMI areas and/or will only be applied to projects that serve presumed benefit categories, or 51% or more of the LMI population.

Geographic Distribution

Target Area	Percentage of Funds
City of Manhattan	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Projects are allocated geographically as required by HUD regulations to benefit identified LMI areas and neighborhoods, and LMI persons.

Discussion

The City believes the projects identified will best serve the citizens' needs as they exist now.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Affordable housing in Manhattan is undertaken by the Manhattan Area Housing Partnership, Inc. (MAHP), a local Kansas Community Housing Development Organization (CHDO) and other private developers. In 2015, the MAHP received tax credits and HOME funds to construct an additional 42 units of affordable housing. The City supports local efforts to expand affordable housing through the waiving of building permit and utility hook-on fees. In the past, the MAHP has collaborated with agencies in the City to provide additional public and affordable housing. The City does not own any housing units.

MAHP has submitted an application for additional tax credits to develop housing for elderly persons. In May 2019, MAHP was notified that their application was approved, and these units will be constructed on land currently owned by the City.

The Manhattan Emergency Shelter, Inc. receives state administered ESG funds to address the needs of the homeless and operates specific programs that house special populations. There are five affordable housing developments in Manhattan that set aside apartments specifically for housing homeless persons as they stabilize their situations. The Crisis Center also receives state administered ESG funds and provides housing for spouses who become homeless to escape abuse. Other Special Needs populations in Manhattan are too small to warrant special funding, and are therefore incorporated into other programs.

Through the rent and utility support funding, CDBG funds will assist MESI with homeless prevention for an estimated 25 households. Through the Housing Rehabilitation project, the City proposes to rehabilitate 10 homes, but the City has no plans to acquire or build housing units. The City collaborated with the Manhattan Housing Authority for public housing modernization efforts at the Apartment Towers, which contains of 88 units that serve approximately 120 residents.

One Year Goals for the Number of Households to be Supported	
Homeless	48
Non-Homeless	88
Special-Needs	45
Total	181

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	22
The Production of New Units	0
Rehab of Existing Units	9
Acquisition of Existing Units	0
Total	31

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The major issue in Manhattan in regards to housing is affordability. The City therefore will focus efforts on preserving and rehabilitating existing housing stock and will support private development through various means. The most recent efforts involve development of senior living residences as an affordable option for LMI residents. Other efforts include proposed “Tiny Homes” and the City has undertaken a review of these types of homes in relation to existing building codes. The new code proposed for adoption will include code and zoning rules to allow for this type of construction.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Manhattan owns no Public Housing Units, but supports the Manhattan Housing Authority (MHA) which is the local Public Housing Authority (PHA) in its efforts to improve existing facilities.

Actions planned during the next year to address the needs to public housing

The City addresses the needs of public housing through support of the MHA in the activities planned for improving its housing units. The City assisted the MHA, by financing the remaining repairs at Apartment Towers through a \$1 million bond. These repairs included replacing the leaking windows, and addressing the deteriorated sanitary sewer lines. Renovations were completed in November of 2018 and the facility should become fully leased in 2019.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Manhattan Housing Authority promotes involvement in management and encourages residents to participate in homeownership through First Time homebuyer training with Housing & Credit Counseling, Inc., and also refers them to Habitat for Humanity for Homeownership Opportunities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The current Public Housing Assessment System (PHAS) score for the MHA is sub-standard due to the lack of occupancy at Apartment Towers, and depletion of its reserve fund to accomplish critical repairs. Some former residents have been relocated back to Apartment Towers. Leasing activities for the remaining available units is underway. Once the facility is completely leased, the MHA expects to begin re-building its reserve fund.

The PHAS measures occupancy rates, financial health, infrastructure and buildings and how well they are maintained, as well as timeliness of obligation and expenditure of capital funds. The City will continue to collaborate with the MHA to secure positive PHAS scores.

Discussion

The MHA offers housing through several means to LMI individuals, including MHA managed housing units, and various Section 8 vouchers. These methods have been discussed in the Strategic Plan and will be a part of MHA's programming for the foreseeable future.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City does not receive ESG or HOPWA funds, but will address special needs in conjunction with activities for the population at large. The needs of the homeless population are addressed by MESI, and the City plans to provide CDBG funding support for Homeless prevention activities. HUD-VASH works with the MHA to provide housing for veterans and their families, and the Crisis Center provides shelter to spouses and their families who are homeless due to abusive situations.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

MESI programs address this need and are funded through donations and state operated ESG funds.

Addressing the emergency shelter and transitional housing needs of homeless persons

MESI operates a 47 bed facility and programs funded through donations and state operated ESG funds address this need. The Crisis Center has 26 beds that are available to abused spouses and their children. The City will also provide CDBG funds for MESI's Homeless Prevention and Rapid Re-Housing activities.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Homeless persons are identified through a number of sources including the local hospital, school district, law enforcement, Pawnee Mental Health, the Flint Hills Breadbasket, MESI and other agencies.

The City falls within the North East Region of the Kansas BoS CoC operated by the Kansas Statewide Homeless Coalition, and MESI receives funds through KHRC for CoC programs. MESI regularly attends meetings of the CoC and provides input to other agencies within the balance of the state. MESI's programs are designed to help chronically homeless individuals transition to permanent housing and maintain independent living. MESI directly conducts a Homeless Street Outreach effort, or homeless clients may self-identify by presenting themselves at the MESI shelter.

The Riley County Health Department and the Flint Hills Community Clinic address the health needs for homeless and uninsured. The Flint Hills ATA Bus provides transportation to individuals needing transportation to agencies that provide assistance to the homeless. Big Lakes Developmental Center, Inc., provides training specifically to intellectually disadvantaged individuals to help them become self-sufficient. The HUD VASH representative works solely with veterans and their families through the "Housing First" principle to access the services needed for transition to permanent housing.

The Crisis Center shelters abused spouses and families who must flee violence in the homes and certifies those seeking shelter as homeless. They provide emergency shelter only for those who are in danger and cannot remain in their own homes. The Crisis Center works with many agencies and organizations,

including the Manhattan Housing Authority, to provide permanent shelter for their clients.

The Manhattan Emergency Shelter is not able to house any minor children without a parent or guardian. The Shelter staff must call authorities to report the child is without a parent/guardian and is seeking shelter for unaccompanied youth under the age of 18. If the unaccompanied youth is age 18-24, MESI will house them and create a case plan for permanent housing.

USD 383 identifies unaccompanied youth as children living on their own or with an adult who is not their legal guardian, and children in homeless families. Through the School District's Families in Transition (FIT) program, families and unaccompanied youth are tracked and assisted through a variety of means designed to assure education opportunities continue as well as address urgent needs involving nutrition, health care, basic necessities and housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

No person who is being discharged from a publicly-funded institution or system is discharged into homelessness. Manhattan Emergency Shelter, Inc. is not allowed to be a "discharge plan" from a publicly funded institution, unless the individual was homeless before entering the institution and resided in the institution for less than 90 days. In the event someone has slipped through the cracks or has been discharged to a location where they are no longer welcome, MESI will house them in their emergency shelter as they are considered homeless at that time. It is the responsibility of each institution's discharge planning to find its clients suitable housing and not discharge someone into homelessness. However, MESI does work with the institutions and refers them to other housing options in the community or surrounding area. Agencies in Manhattan are very effective in communicating with each other in regards to the needs of their clients.

Local providers work with Housing and Credit Counseling, Inc. (HCCI) to provide financial counseling to individuals at risk of becoming homeless. HCCI receives referral from numerous agencies in Manhattan and provides other services including first time homebuyer training. MESI operates a Homelessness prevention program which provides counseling and rent and utility arrears or rapid re-housing services to individuals and families in need of shelter. The Crisis Center specifically provides housing for abused spouses and their children who are in need of a safe place to stay. Pawnee Mental Health Services (PMHS) coordinates with MESI, MHA, and MAHP, Inc. to secure housing for individuals with mental illness.

MAHP's Financial Assurance Program assists Social Security and Veteran's Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third party payee. MAHP staff work directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence. This is the only Social Security Administration approved program in the Manhattan area.

Discussion

The public service agencies in Manhattan are very efficient at working together to meet the needs of residents. The City supports these agencies through locally raised funds to support essential public services.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City implements its planning and zoning authority through the Manhattan Urban Area Comprehensive Plan, the Manhattan Urban Area Subdivision Regulations and the Manhattan Zoning Regulations. The Manhattan Urban Area Planning Board and Manhattan City Commission develop, adopt, and update the comprehensive plan and other policy documents for the Board's jurisdictional area, and complete formulation of Subdivision and Zoning Regulations for the City. The Manhattan Urban Area Comprehensive Plan adopted in 2015 by the Planning Board and City Commission, provides the highest level policy guidance regarding affordable housing and contains guiding principles, goals and policies in various chapters that address affordability.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

This Comprehensive Plan is reviewed on an annual basis and was amended in 2017 through incorporation of the Aggieville Community Vision Plan update, the Big Blue & Kansas River Floodplain Management Plan, the Hartford Hills Master Plan, and the Flint Hills/Fort Riley Joint Land Use Update.

Chapters 3 and 8 provide the most relevant of these by promoting non-homogeneous neighborhoods containing a mixture of housing types and densities throughout the community that address the needs of various populations, including seniors and LMI families and individuals. Part of the housing affordability equation is location within the community and the need for easy access to retail and professional services, jobs, transportation, and healthcare, which is promoted by the Comprehensive Plan through mixed neighborhoods in all portions of the community, as well as incorporation of neighborhood services. The up- and down-zonings that the City has completed following the Plan's adoption in 2015, in the core neighborhoods around the KSU campus, Aggieville and east of City Park, are designed to help expand housing options, stabilize older lower density neighborhoods, and help preserve the more affordable existing housing stock in these core areas.

Providing healthy, livable neighborhoods that offer a variety of lifestyle options is based on the following guiding principles:

- Expanded housing options to meet the needs of a changing community;
- Revitalization of established and core area neighborhoods; and
- Access to amenities that encourage active and healthy lifestyles.

The Manhattan Zoning Regulations implement the Comprehensive Plan's recommendation to promote affordable housing and create neighborhoods that include a mixture of housing options located throughout the community. The Zoning Regulations allow a variety of housing types throughout the city and incorporate small minimum lots sizes for single-family and single-family attached dwellings. In addition, Manhattan has a significant number of core area neighborhoods that are zoned to allow for two or more dwelling units in a structure. In 2016, the City contracted with a consultant to update its zoning and subdivision regulations into a Unified Development Ordinance (UDO) to implement recommendations identified in the Comprehensive Plan. The project involves a process that:

- Engages community stakeholders and utilizes best practices to create a set of land development regulations that remove barriers to affordable housing;
- Simplifies and streamlines the development process; creates regulations that are more user friendly, and more visual with matrixes and graphics; and
- Is more searchable on-line and on mobile devices.

This Process is anticipated to be completed in the fall of 2019, and will be tied to the City’s municipal code of ordinances.

The City will propose adoption of the 2018 International Building Code Series, and the 2017 National Electrical Code in June of 2019, which will become effective on January 1, 2020, if the City Commission approves. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Code Services Division ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act.

Riley County has several Disaster Plans that address different potential catastrophic events. The City has reviewed these individual plans and has participated in Table Top exercises and other activities to identify weaknesses in the existing plans and take appropriate actions to resolve.

Discussion:

The Comprehensive Plan contains policies and guiding principles which promote neighborhoods that contain a mixture of land uses and diversified housing options to serve a growing and changing population, including housing that is affordable and design that allows for multi-modal connectivity between adjacent neighborhoods, commercial areas, parks and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

The City’s efforts in regards to disaster planning include conducting a table top exercise with the Corps of Engineers related to a catastrophic flood event caused by a hypothetical failure of the Manhattan Levee System, and educating responders regarding the most vulnerable section of the City and County and actions that should be taken. The City and Riley County have also been conducting the Resilient Wildcat Creek initiative to address flash flooding issues in the basin and specifically identify and address social vulnerabilities that typically impact LMI residents. This effort will be expanded to other parts of the community that is impacted by flooding and can also be used in the event of other types of disasters.

There are no known negative effects of City policy in regards to affordable housing and residential investment.

AP-85 Other Actions – 91.220(k)

Introduction:

The greatest obstacle to meeting underserved needs in Manhattan is a shortage of funding. The City will encourage collaboration with and amongst agencies to address needs as they are identified.

Actions planned to address obstacles to meeting underserved needs

The City will continue to collaborate with the Social Services Advisory Board which provides funding from local sources to support essential public services.

Actions planned to foster and maintain affordable housing

The City plans to continue the Housing Rehabilitation Project to preserve livability and accessibility of existing affordable structures and preserve affordable housing. Currently, Housing and Credit Counseling, Inc. collaborates with Habitat for Humanity to provide home ownership counseling to eligible LMI Clients throughout the local area. An additional effort by citizens requesting guidance on the construction of “Tiny Homes” is under discussion for inclusion in code and zoning laws, with the intention of expanding the affordable housing stock.

Actions planned to reduce lead-based paint hazards

The City follows the HUD lead-based paint regulations and, in April, 2019, recertified with the state of Kansas as a lead based activity firm.

Actions planned to reduce the number of poverty-level families

The Manhattan Urban Comprehensive Plan contains goals, policies and guiding principles which promote neighborhoods that contain a mixture of land uses and diversified housing options to serve all income levels and a growing and changing population; and promotes affordable housing.

Actions planned to develop institutional structure

The Comprehensive Plan includes housing that is affordable and neighborhood designs that promote multi-modal connectivity between adjacent neighborhoods, commercial areas, parks and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan Urban Area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

Actions planned to enhance coordination between public and private housing and social service agencies

The Social Services Advisory Board (SSAB) was created by and reports to the City Commission. The SSAB provides recommendations on funding for social service activities in the City with local funds and with CDBG funds. The City will continue to encourage public services agencies, the MHA, MESI, and the Crisis Center to participate in the monthly Riley County Council Social Service agency meetings, to increase collaboration in providing services and accessing additional resources.

The Riley County Health Department provides a variety of services to residents and families in the City of Manhattan and throughout Riley County, and is one of the sponsoring agencies for the newly formed Flint Hills Wellness Coalition. The Flint Hills Wellness Coalition has begun development of a one stop Website that will list links to agencies and resources that can be accessed by citizens needing assistance of a variety of types.

Discussion:

The City is committed to maintaining a quality of life for all individuals and families.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The City of Manhattan does not expect any program income to be received in the 2019 Program Year. The only source of Program Income that the City receives is from repayment of Housing Rehabilitation Grants by homeowners who have not maintained the terms of their grant agreement. The City has no Urban Renewal Settlements and no grant funds have been returned to the line of credit for which use has not been determined in a prior statement or plan.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	71.00%

The City estimates that the majority of funds currently used for activities that benefit LMI persons will exceed 70% over the years covered by the 2015 to 2019 Strategic Plan. This is based on the current rate of 100% of prior years' funds that have been used for activities beneficial to LMI persons.

CDBG PY 2019 Annual Action Plan

Unique Appendices:

Citizen Participation Plan, Amended 2018

Public Input Advertisement

Request for Public Services Proposals

Summary of Public Input and City Departments Review and Discussion

Public Review and Hearing Advertisement

Maps of Project Locations

City Lead Activity Firm Certification

Analysis of Impediment 2015-2019

CERTIFICATION OF CLERK

I, Brenda K. Wolf, the duly appointed, qualified, and Deputy City Clerk of Manhattan, Kansas, do hereby certify that the foregoing Amended Plan was duly adopted at a meeting of the City of Manhattan, Kansas, held on the 15th day of May, 2018, and that said Amendment has been compared by me with the original thereof on file and of record in my office, is a true copy of the whole of said original.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the City of Manhattan, Kansas, this 16th day of May, 2018.



Brenda K. Wolf

Brenda K. Wolf, CMC, Deputy City Clerk



Citizen Participation Plan

Community Development Block Grant Program,
Section 108 Loan Guarantee Program and Disaster Relief

I. Introduction and Purpose

The Consolidated Plan is a five-year plan describing the community development needs of the City of Manhattan, hereinafter referred to as “the City”, as well as the resources, priorities and proposed activities to be undertaken under certain U.S. Department of Housing and Urban Development (HUD) programs, including the Community Development Block Grant (CDBG) Program, CDBG Disaster Relief (CDBG-DR) Program, and Section 108 Loan Guarantee Program (Section 108). The Consolidated Plan creates an opportunity for citizen participation to shape various housing and community development programs into effective and coordinated neighborhood development strategies.

Citizen participation is the heart of the consolidated planning process, involving citizens in decisions that directly affect their lives. The purpose of the Citizen Participation Plan, hereinafter referred to as “the CPP”, is to encourage and ensure full and proper citizen participation at all stages of the Consolidated Plan process, or for an Amendment to the Consolidated Plan and/or an Annual Action Plan. The CPP formally designates structure, procedures, roles and policies to be followed by program participants.

The City is required by law (24 CFR Part 91 of the Housing and Community Development Act of 1974, as amended) to develop and adopt a CPP, that sets forth detailed, written policies and procedures for citizen participation in the development and implementation of the Consolidated Plan. The CPP must involve the public, particularly low- and moderate-income citizens, in developing and implementing the Consolidated Plan and its integral components which may include: each Five-Year Strategic Plan, Annual Action Plans; any future Section 108 Loan Guarantee Program application; annual Consolidated Annual Performance Evaluation Reports (CAPER), CDBG-DR Action Plans; as well as any Substantial Amendments. Substantial amendment may occur due to changes in Allocation priorities or the method of distribution of funds; or to carry out an activity using funds from any program covered by the Consolidated Plan, not previously described in the Annual Action Plan.

Nothing in this CPP shall restrict the responsibility and authority of the City from developing and executing its Consolidated Plan.

II. Plan Objectives

To achieve the purposes of the Plan, six objectives are established. These objectives constitute basic standards by which proper citizen participation can be measured, and are consistent with federal requirements for the CDBG Program, CDBG - DR Program, and the Section 108 Loan Guarantee Program:

- Provide for and encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income, including non-English speaking residents.
- Provide citizens with reasonable and timely access to local meetings, information and records.
- Provide for public hearings to obtain citizen's views and to respond to questions at all stages of the consolidated planning process.
- Provide for technical assistance to groups representative of persons of low-and moderate income that request assistance in developing proposals.
- Provide for a timely written answer to written complaints and grievances regarding the Consolidated Plan.
- Provide a process to expedite Citizen Participation in the event of a federally declared disaster.

A. Encourage public participation and engagement

The City will provide for and encourage citizens to participate in the preparation of the Consolidated Plan, Substantial Amendments, and any Section 108 Loan Guarantee application, emphasizing participation by low- and moderate-income persons. This public participation is to occur as the Consolidated Plan, Annual Action Plan, Section 108 application, CAPER, or Substantial Amendments are being developed. Additionally, the City will take whatever actions are appropriate to encourage all its citizens, including minorities as well as persons with disabilities, to participate in this process. The City will provide information to neighborhood associations that represent low- and moderate-income residents and will work with the Manhattan Housing Authority to ensure that residents are informed of the planning process and have the opportunity to participate.

There are a minimum number of non-English speaking residents in the City. If a member of the public or particular program beneficiary is non-English speaking, the City will make every attempt to provide an interpreter.

B. Access to meetings and materials

The City will disseminate and make available to citizens, public agencies and other interested parties information that includes:

1. A summary of funding the City expects to receive through the CDBG Program, and any Section 108 application and the estimated amount that will benefit low- and moderate-income people;
2. The range of projects and related activities that may be undertaken with funding, as well as projects previously funded;

3. The City's process of developing the Consolidated Plan, Annual Action Plan, any Section 108 application, CAPER, or Substantial Amendments, and their components;
4. The public's role in the program;
5. A summary of the City's proposed activities are likely to result in displacement of persons, and the City's Plans for minimizing displacement of persons as a result of those activities; and
6. Other materials as needed to inform and educate the public.

The proposed and adopted Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, Section 108 documentation, as well as Substantial Amendments, will be accessible to the public at no cost on the City's website. Additionally, these documents will be available for review at the Manhattan City Hall and Manhattan Public Library. The City will also provide a reasonable number of free copies of the plan to citizens and groups upon request. These materials will also be available upon request in a form accessible to persons with disabilities.

Program information and records regarding the consolidated planning process are available upon request to the City during normal business hours. Such documents include the following:

1. Records of public meetings;
2. All key documents, including prior applications, letters of approval, grant agreements, the Citizen Participation Plan, performance reports, evaluation reports, other reports required by HUD and the proposed and approved application for the current year;
3. Copies of the federal regulations and issuances governing the program; and
4. Documents regarding other important program requirements, such as contracting procedures, environmental records, fair housing and other equal opportunity requirements, and relocation provisions.

All consolidated planning documents will be kept on file for a minimum of five years after the date of grant closeout.

C. Public hearings

Notification: Notice of all public hearings will be published in the Manhattan Mercury and posted on the City's website no less than 5 days and no more than 20 days prior to the hearing. Meeting information will be provided to stakeholders including public and private agencies providing housing assistance, public services, neighborhood organizations, the Manhattan Housing Authority and other interested parties.

The City will hold at least two public hearings during the Program year to obtain citizens' views and respond to proposals and questions during the consolidated planning process. All public hearings will be held at times and locations convenient to

potential and actual beneficiaries and accessible to persons with disabilities. Hearings will be held as follows:

1. One hearing will be held regarding community needs as the Consolidated Plan, Annual Action Plan, and any Section 108 applications are being developed. These public hearings may be conducted simultaneously.
2. One hearing will be held on the components of the proposed Consolidated Plan which includes the Annual Action Plan, any Section 108 application and/or Substantial Amendments, prior to submission.

Comment periods: The City will provide a 30-day period to receive comments from citizens after the proposed Consolidated Plan, Annual Action Plan, Section 108 application, and/or Substantial Amendment is published. The dates of the public comment period will be published in the Manhattan Mercury and posted on the City's website. Meeting information will be provided to stakeholders including public and private agencies providing housing assistance, public services, neighborhood organizations, the Manhattan Housing Authority and other interested parties.

Any comments received by the City in writing or by email, or orally at the public hearings, will be considered. A summary of all comments received, including comments not accepted and a rationale for their rejection will be attached to the specific document under consideration. No project or related activity may be undertaken, prior to the expiration of the public comment period.

The City will also provide a 15-day period to receive comments from citizens after the proposed CAPER is published for review. The dates of the public comment period will be published in the Manhattan Mercury and posted on the City's website. A summary of all comments received, including comments not accepted and a rationale for their rejection will be attached to the specific document under consideration.

Substantial Amendments: From time to time, a Substantial Amendment may be made to the Consolidated Plan and/or Annual Action Plan. A Substantial Amendment must be considered when one of the following actions occurs:

1. A new project is identified that was not previously included in the Consolidated Plan and Annual Action Plan;
2. A budgeted project covered by the Consolidated Plan and all its related activities is deleted;
3. A more than forty percent (40%) increase occurs in the budget of a project;
4. Any change in a project's national objective designation;
5. Funds will be reallocated to address emergency needs related to a federally declared disaster after all other sources of emergency aid have been used up.

Prior to implementing a Substantial Amendment, the City shall comply with the Notification, Public Hearing, and Comment Period requirements for adoption of the Consolidated Plan.

Minor Amendments: Minor amendments to the Consolidated Plan are defined as follows:

1. Change in scope, location or intended beneficiaries of a CDBG project described in the Consolidated Plan or Annual Action Plan such that:
 - The project's planned units of service are reduced
 - The project's service area or boundaries change
 - The project's intended beneficiaries change yet still meet the same National Objective designation and project purpose.
2. A change in the sub-recipient, but the scope, location or intended beneficiaries remains the same,
3. Deletion of an activity within a project described in the Annual Action Plan.

Minor Amendments are not subject to a substantial amendment process, but will be incorporated in the CAPER for review during the public comment period and submitted annually to HUD.

D. Technical assistance provision

The City will provide technical assistance to interested groups, which are representative of low- or moderate-income persons, who request assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Requests for technical assistance must be made in writing. The City will determine the level and type of assistance provided.

E. Complaint procedures

Complaints regarding the City of Manhattan Consolidated Plan will be answered by the Community Development Department staff in a timely and responsive manner. The staff will make every reasonable effort to provide written response to every written citizen complaint within fifteen (15) working days. If the complainant considers the staff response to be unsatisfactory, the complaint may be addressed to the City Manager, whose decision is final.

F. Federally Declared Disasters

In the event of a federally declared disaster, the City of Manhattan will exhaust all other sources of emergency funding (FEMA, SBA, private insurance, etc.) before substantially amending the Consolidated Plan and/or Annual Action Plan, to reallocate CDBG funds from a HUD-approved Annual Action Plan. In the event that HUD provides the City with a CDBG-DR allocation, the City will create a separate CDBG-

DR Action Plan that will be published for citizen input and review, following an expedited Public Hearing process for disaster relief.

Public Input will be requested to determine uses for CDBG-DR allocated funds, which will address one of the National Objectives of providing benefit to low- and moderate-income persons; addressing slum and blight; or addressing urgent needs. Reducing Slum and Blight and addressing Urgent Needs will allow the City to provide housing rehabilitation assistance or to provide emergency public services to persons or households that otherwise do not qualify as LMI. Urgent Need activities will be limited to alleviating existing conditions which pose a serious and immediate threat to the health or welfare of the community, which has become critical within 18 months of a disaster event.

Section 122 of the Housing and Community Development Act of 1974, as amended (42 USC 5321), authorizes the suspension of statutory requirements for use of CDBG funds in disaster areas. As part of the CDBG – DR Action Plan, the City may request Public Input on the removal or modification of limitations on Administration or Public Services Projects, as well as modify beneficiary requirements, to facilitate efficient disaster recovery.

CDBG-DR Access to Meetings and Materials

The City will disseminate and make available to citizens, public agencies and other interested parties information that includes:

1. A summary of funding the City expects to receive through the CDBG-DR Program Action Plan, and the estimated amount that will benefit low- and moderate-income people;
2. The range of projects and related activities that may be undertaken with funding;
3. The City's process for developing the CDBG-DR Action Plan, its components, and the public's role in that process;
4. A summary of the City's proposed activities that are likely to result in displacement of persons, and the City's Plans for minimizing displacement of persons as a result of those activities; and
5. Copies of the federal regulations and issuances governing the CDBG – DR program; and
6. Documents regarding other important program requirements, such as contracting procedures, environmental records, fair housing and other equal opportunity requirements, and relocation provisions.
7. Records of public meetings;
8. Other materials as needed to inform and educate the public and all key documents, including the approved DR Action Plan, the Citizen Participation Plan, quarterly performance reports, and any other document pertinent to Public Participation, for the duration of the CDBG-DR Action Plan.

The documents, rules, and important web site links will be posted on a “Disaster Recovery” webpage on the City’s website: www.cityofmhk.com. The CDGB-DR Action Plan will be accessible to the public at no cost and the City will take whatever actions are appropriate to encourage all its citizens, including minorities as well as persons with disabilities, to participate in this process. In addition to documents being made available on the City’s “Disaster Recovery” webpage, a reasonable number of free copies of the Plan, Program information, and records regarding the planning process will be made available to any interested party upon request to the City made during normal business hours.

All CDBG – DR documents will be kept on file for a minimum of five years after the date of grant closeout.

Public Participation and Engagement

The City will provide for and encourage citizens to participate in the preparation of the CDBG - DR Action Plan or Substantial Amendment, emphasizing participation by low- and moderate-income persons. The City will provide information to neighborhood associations that represent low- and moderate-income residents, and will work with the Manhattan Housing Authority to ensure that their residents are informed of the planning process and have the opportunity to participate.

Meeting information will also be sent via available social media channels and posted on the local cable television channels. Hearing information will be provided to stakeholders including public and private agencies providing housing assistance, public services, neighborhood organizations, and any other interested parties. The public meeting and hearing will be held at times and locations convenient to potential and actual beneficiaries and will be accessible to persons with disabilities.

Public participation and receipt of input will begin immediately after a disaster occurs and will be accepted continuously as the Plan is being developed to identify the most urgent recovery issues. Participation in development of the Action Plan may include collaboration with key area agencies, Riley County Emergency Management, and input from other neighboring counties that may have been impacted by a disaster.

Public Input Meetings and Hearings, and Comment Periods

The City will hold one Public Input Meeting during development of the CDBG-DR Action Plan or Substantial Amendment to obtain citizens’ views regarding community needs and respond to proposals and questions.

Public Input Meeting: Notice of the Public Input Meeting will be published in the Manhattan Mercury and posted on the City’s “Disaster Recovery” website and other available social media platforms no less than 5 days, and no more than 15 days, prior to the Public Input meeting. Input and comments will be accepted until 10 calendar days after the Public Input Meeting.

Public Hearing: After the initial public input period is completed (i.e. 10 days following the Public Input Meeting date), the City will finalize the CDBG-DR Plan or Substantial Amendment and make it available to the Public for review 15 days before the Public Hearing date. The City will provide notice of the Public Hearing a minimum of 15 days prior to that date but no more than 20 days prior, using the same platforms as the public input meeting. The hearing will be held on the components of the proposed final Action Plan or Amendment at the first available City Commission meeting, during which the governing body will authorize necessary revisions and submission to HUD.

Any comments or suggestions received by the City in writing or by email, or orally at the public hearing, will be considered. A summary of all comments received, including suggestions not accepted for inclusion or action, and a rationale for their rejection will be attached to the specific document under consideration. No project or related activity may be included in the CDBG-DR Action Plan, nor undertaken, prior to the expiration of the public hearing comment period.

III. Displacement

The City of Manhattan will make all reasonable efforts to ensure that activities undertaken with CDBG Program or Section 108 funds will not cause unnecessary displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available and when the activity is determined necessary in order to carry out a specific goal or objective that is of benefit to the public. If displacement is necessary, the City will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies' Act of 1970, as amended and Section 104 (d) of the Housing and Community Development Act of 1974, as amended and described in 24 CFR 42, Subpart C.

IV. Amendments to the Citizen Participation Plan

The provisions of the Citizen Participation Plan may be amended by the Manhattan City Commission.

PASSED AND APPROVED by the Governing Body of the City of Manhattan, Kansas, this 15th day of May, 2018.



Linda Morse, Mayor

ATTEST:



Brenda K. Wolf, CMC, Deputy City Clerk

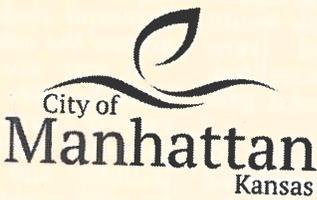


In The Matter of Community Development Block Grant

STATE OF KANSAS, RILEY COUNTY, ss

Printer's Fee \$ 125.66

Payment Date _____



**City of
Manhattan
Kansas**

**Community Development Block Grant
2019 Program Year Annual Plan
Public Input Meeting and Online Suggestion Box**

The City of Manhattan invites all interested persons to a Public Meeting to provide input, and propose and discuss projects, and public services support activities that could be included in the Community Development Block Grant (CDBG) 2019 Annual Action Plan Application.

This meeting will be held on **Thursday, November 8, 2018** beginning at **5:30 PM**, in the City Commission Room at Manhattan City Hall, 1101 Poyntz Avenue.

Citizens may also submit **project suggestions online** using the CDBG 2019 Annual Plan Input Form, which will be available at www.cityofmnhk.com/CDBG from **Sunday, October 28, 2018, to Friday, December 7, 2018**. For more information please contact:

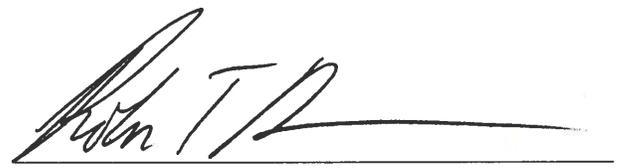
Christina L'Ecuyer, Grant Administrator
Community Development Department
1101 Poyntz Avenue Manhattan, KS 66502
lecuyer@cityofmnhk.com
(785) 587-2430



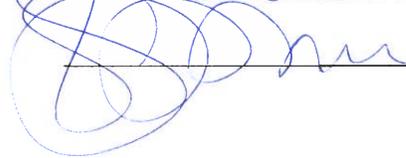
This meeting is being held in the City Commission Room at City Hall. In accordance with provisions of the ADA, every attempt will be made to accommodate the needs of persons with disabilities. Please contact the Human Resources Department (587-2443) for assistance.

I, Robin Phelan being first duly sworn, depose and say: That I am Advertising Director of *The Manhattan Mercury*, a daily newspaper printed in the State of Kansas, and published in and of general circulation in Riley County, Kansas, with a general paid circulation on a daily basis in Riley County, Kansas and that said newspaper is not a trade, religious or fraternal publication. Said newspaper is a daily published at least weekly 50 times a year; has been so published continuously and uninterruptedly in said county and state for a period of more than five years prior to the first publication of said notice; and has been admitted at the post office of Manhattan in said County as second class matter. That the attached notice is a true copy thereof and was published in the regular and entire issue of said newspaper for one consecutive insertion the first publication thereof being made as aforesaid on the 28th day of October, 2018 with subsequent publications being made on the following dates:

- On the ___ day of ____, 2018
- On the ___ day of ____, 2018
- On the ___ day of ____, 2018



Subscribed and sworn to before me this 29th day of October, 2018.

 Notary Public

Notary Seal

SAMANTHA FOSHA
Notary Public - State of Kansas
My Appt. Expires 08/2021

In The Matter of Community Development Block Grant (CDBG) 2019

STATE OF KANSAS, RILEY COUNTY, ss

Printer's Fee \$ 125.06

Payment Date _____



**Community Development Block Grant (CDBG) 2019
Public Services - Request for Proposals
October 21, 2018**

The City of Manhattan is requesting proposals from qualified organizations for the provision of public service activities in the CDBG 2019 Program Year which begins July 1, 2019 and ends June 30, 2020.

Funding will be allocated to the City by the U.S. Department of Housing and Urban Development (HUD), through the CDBG Program to support eligible Public Services which exclusively benefit low and moderate income persons as defined by HUD. Public Services proposed must either be new activities or expansions of existing activities. Current CDBG public services may re-apply to continue delivery of services.

The request for proposal application, instructions and eligible activities list are available on the City of Manhattan website: <http://www.cityofmnhk.com/cdbg>

Proposal applications are due to the Community Development department at City Hall by 5:00 pm on December 7, 2018.

For more information please contact:

Christina L'Ecuyer, Grant Administrator
City of Manhattan Community Development Department
1101 Poyntz Avenue Manhattan, KS 66502
lecuyer@cityofmnhk.com
(785) 587-2430

I, Robin Phelan being first duly sworn, depose and say: That I am Advertising Director of *The Manhattan Mercury*, a daily newspaper printed in the State of Kansas, and published in and of general circulation in Riley County, Kansas, with a general paid circulation on a daily basis in Riley County, Kansas and that said newspaper is not a trade, religious or fraternal publication. Said newspaper is a daily published at least weekly 50 times a year; has been so published continuously and uninterruptedly in said county and state for a period of more than five years prior to the first publication of said notice; and has been admitted at the post office of Manhattan in said County as second class matter. That the attached notice is a true copy thereof and was published in the regular and entire issue of said newspaper for one consecutive insertion the first publication thereof being made as aforesaid on the 21st day of October, 2018 with subsequent publications being made on the following dates:

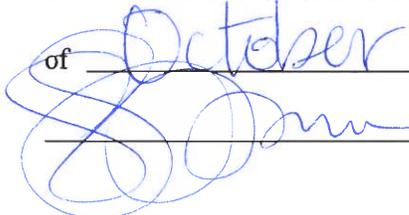
On the ___ day of ____, 2018

On the ___ day of ____, 2018

On the ___ day of ____, 2018

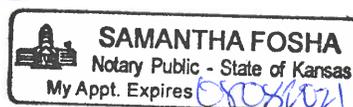


Subscribed and sworn to before me this 30th day of October, 2018.



Notary Public

Notary Seal



City Administration Discussion of CDBG Project Proposals

December 13, 2018, in the Harmon Room

Present: ERIC CATTELL; Chad Bunger; Wyatt Thompson; EDWARD EASTES; Brian Johnson; Randy DeWitt; RON FEHR; Dennis Marstall; Alfonso Leyva; Jason Hilgers

Project proposals may include improvements, renovations, or construction of non-residential historic buildings, ADA improvements to public facilities such as community centers, senior centers, homeless shelters, youth centers, parks and recreational facilities, flood drainage improvements, street improvements, sidewalks, childcare centers or any other public facility that serves low-income demographics.

Projects slated for the 2018 grant year include construction of Linear Trail connections on South Manhattan Avenue, and Pecan Circle. These are being **pushed into 2019** due Union Pacific buy-in (both cross RR tracks) and design delays.

Department References:

CD: Community Development; CMO: City Manager's Office; P&R: Parks and Recreation; PW: Public Works

Proposals received for 2019 grant year:

Planning Studies/Feasibility (under Admin)

- A facilities plan for the Roundhouse, estimated \$25k: CD Suggestion: study to repurpose to an "open air" or office space, and depends on decision regarding Roundhouse future use as "special pops" programming. P&R says Cost estimate to move Clay, painting, teaching kitchen est. \$300,000
- A feasibility study for Kitchen/renovation in Annex, P&R offered at meeting: consider conceptual design for Annex, will cost approximately \$25,000. Would provide alternative uses for Kitchen spaces, but too much is unknown. Also need to provide ADA upgrades to Bathrooms at Annex.
- Child Care Center study. (Riley County Health Department - still looking into it, price unknown).

Public Facilities:

- Support for replacing the boiler system in the NCFH AAA building. Agency Request (CDBG is last resort, as the replacement was needed summer of 2019.)
- Funds to improve parking and utility upgrades for Breadbasket and Douglass Center Annex building (relocate outside freezer, and demolish city garage to expand parking). P&R request – electrical power lines would have to move or be buried (update in PI section).
- Shelter for homeless youth (18 to 24 yr. olds – USD 383), CD suggestion.
- Senior Center on west side of town – Citizen suggestion (currently not eligible, not an LMI Area).
- ADA upgrades to Health Dept., and Community Mental Health Facility – Citizen suggestion.
- Demolition and conversion of abandoned or neglected properties with excessive code violations. Non-profit suggestion; (City demolishes neglected/condemned properties, but there aren't many.)
- Portable toilets on Linear Trail (P&R suggestion, not eligible).

Public Infrastructure:

- Sidewalk and Bike lane on Jarvis Drive from Todd to Jardine. Maybe a \$60k project. May be a challenge with the neighbors. (PW says less than \$20,000 for sidewalk only and thinks City can build it easier.) 1 staff and 1 citizen suggestion (Update: project is already in the works as far as getting neighborhood buy in)
- Bike Lane on Sunset Ave. from Claflin to Montgomery, Thackrey or Hawk (at minimum, to Hunting). This was a planned project that the City might run out of funding for. This project runs through both an LMI and non-LMI area, but the total of the two block groups are still LMI – Bike Staff suggestion.
- Covered Bus Shelters in LMI neighborhoods (ATA – using students design) (CD suggestion, PY 2020 project?)
- Tree planting in Northview – Citizen Suggestion (referred to Street Tree program & Forestry dept.)

City Administration Discussion of CDBG Project Proposals

- Improvements to the Douglass Center – 2 citizens suggestions. (1 may be a DCC board member, P&R clarified removing asbestos tile in lobby and improving structural support underneath)
- Formalized crossing on Poyntz Avenue to entrance of City Park (south side parking lot - 12th street entrance. (Existing guerilla-painted crosswalk? PW says not guerilla, but agrees it needs formalized)
- Create Bike Lane on Sunset Avenue from 17th to Anderson. Bike Rider suggestion (Future Project – PW says street needs work).
- Improvements to brick sidewalks leading to Douglass Park Complex and along Yuma, (may have historic impact issue, if existing brick). Citizen Suggestion (address after work in Douglass Park area complete).
- Sidewalk replacement program for qualified homeowners (specifically grass covered, or with tree root intrusion.) Citizen suggestion: Likely only historic district eligible.
- Sidewalk along Pottawatomie Avenue, to tie to Linear Trail Trailhead on S. Manhattan. (P&R suggestion: Future year project, depending on S. Manhattan-Linear Trail Connection completion?)
- K-177 Pedestrian crossing (by bridge?) across Railroad to Linear Trail (CMO Suggestion: Needs KDOT buy in, currently not eligible.)
- (Added by P&R at meeting)
 - Kitchen and Bathroom remodel at Douglass Center Annex building; \$350,000
 - East Sidewalk of City Park – part of Trails system \$130,000
 - Municipal Court (Colorado) Park Phase II, \$130-150,000
 - Richards Drive Trail connection (should be done in-house, less than \$15,000)
 - Upgrades to Community House ADA lift. Update: P&R proposing to sell or lease building. Building only eligible for ADA improvements.
 - Utility relocate at Douglass Park (Update: currently being completed by Westar)
 - Pave Griffith Park Parking lot, improve drainage from Park.

Public Services (PS):

- Support for Child Care as a Public Service – Riley Co. Health Dept, Via Christi, & private businesses request.
- Expanded Shelter Services – Citizen suggestion.
- Expand Outreach program for Homeless not in Shelter? – PS Agency suggestion.
- Program to make handicap modifications to vehicles – Citizen Suggestion, does not need income qualification; this is a Presumed Benefit population. (Discussed but no agency applied)
- Support for a set meal site (Citizen Suggestion, this would be a PS, and Breadbasket currently has meal site program, though not set in one location. May be future project).

Housing:

- Rehabilitation programs for LMI Single family home owners (CD will continue to offer).
- Rehabilitation issues at Public Housing (Carlson Plaza is next – MHA Director says wait for now.)
- Other: Seed money, Community Housing/Land Trust. Similar to Lawrence and involving the CHDO (Manhattan Area Housing Partnership, Inc.), or Habitat for Humanity? (non-profit suggestion)
- Affordable housing for Single mom's, with recommendation for collaboration with Habitat For Humanity, and/or KSU architecture (Citizen Suggestion).
- Use sales tax property purchased by City for short term housing, land trust, or shelters. Non-profit suggestion.
- First-time homebuyers program – down payments and maybe in partnership with bank or other agency/foundation/entity. HCCI/FHLB suggestion.
- Housing Study that shows a Market Value Analysis and develops an approach to meet needs for neighborhoods. Maybe develop a tool for use by neighborhoods. (CD suggestion; Do realtor's already have something?)

In The Matter of 2015-2019 CDBG Consolidated Plan

STATE OF KANSAS, RILEY COUNTY, ss

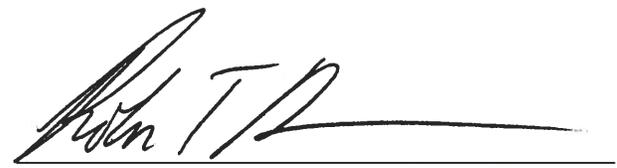
Printer's Fee \$ 119.81
 Payment Date _____

I, Robin Phelan being first duly sworn, depose and say: That I am Advertising Director of *The Manhattan Mercury*, a daily newspaper printed in the State of Kansas, and published in and of general circulation in Riley County, Kansas, with a general paid circulation on a daily basis in Riley County, Kansas and that said newspaper is not a trade, religious or fraternal publication. Said newspaper is a daily published at least weekly 50 times a year; has been so published continuously and uninterruptedly in said county and state for a period of more than five years prior to the first publication of said notice; and has been admitted at the post office of Manhattan in said County as second class matter. That the attached notice is a true copy thereof and was published in the regular and entire issue of said newspaper for one consecutive insertion the first publication thereof being made as aforesaid on the 7th day of May, 2019 with subsequent publications being made on the following dates:

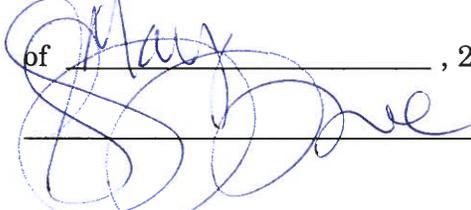
On the ____ day of _____, 2019

On the ____ day of _____, 2019

On the ____ day of _____, 2019

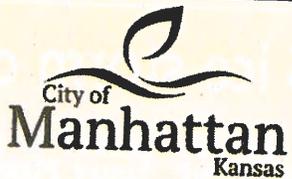


Subscribed and sworn to before me this 21st day of May, 2019.

 Notary Public

Notary Seal


 SAMANTHA FOSHA
 Notary Public - State of Kansas
 My Appt. Expires 08/01/2021



2015-2019 CDBG Consolidated Plan – Amended, and Proposed 2019 Annual Action Plan

Notice of Public Comment Period and Public Hearing

The Community Development Block Grant (CDBG) 2015-2019 Consolidated Plan-Amended and the proposed 2019 Annual Action Plan provide a basis and strategy for the use of funds allocated to the City of Manhattan by the U.S. Department of Housing and Urban Development (HUD). HUD allocated the City with \$556,213 for CDBG Program Year 2019.

All interested citizens are encouraged to review and comment on the proposed 2019 Annual Action Plan, during the public comment period, from **May 7, 2019** through **June 6, 2019**. The documents will be available for viewing on the City's website: www.cityofmnhk.com/cdbg; at City Hall in the Community Development Department, 1101 Poyntz Avenue; and at the Manhattan Public Library, 629 Poyntz Avenue.

In addition, on **Tuesday, May 21, 2019 at 5:30 p.m.**, a **Public Hearing** will be held in the City Commission Room at City Hall, 1101 Poyntz Avenue, to answer questions and receive comments regarding the 2019 Annual Action Plan.

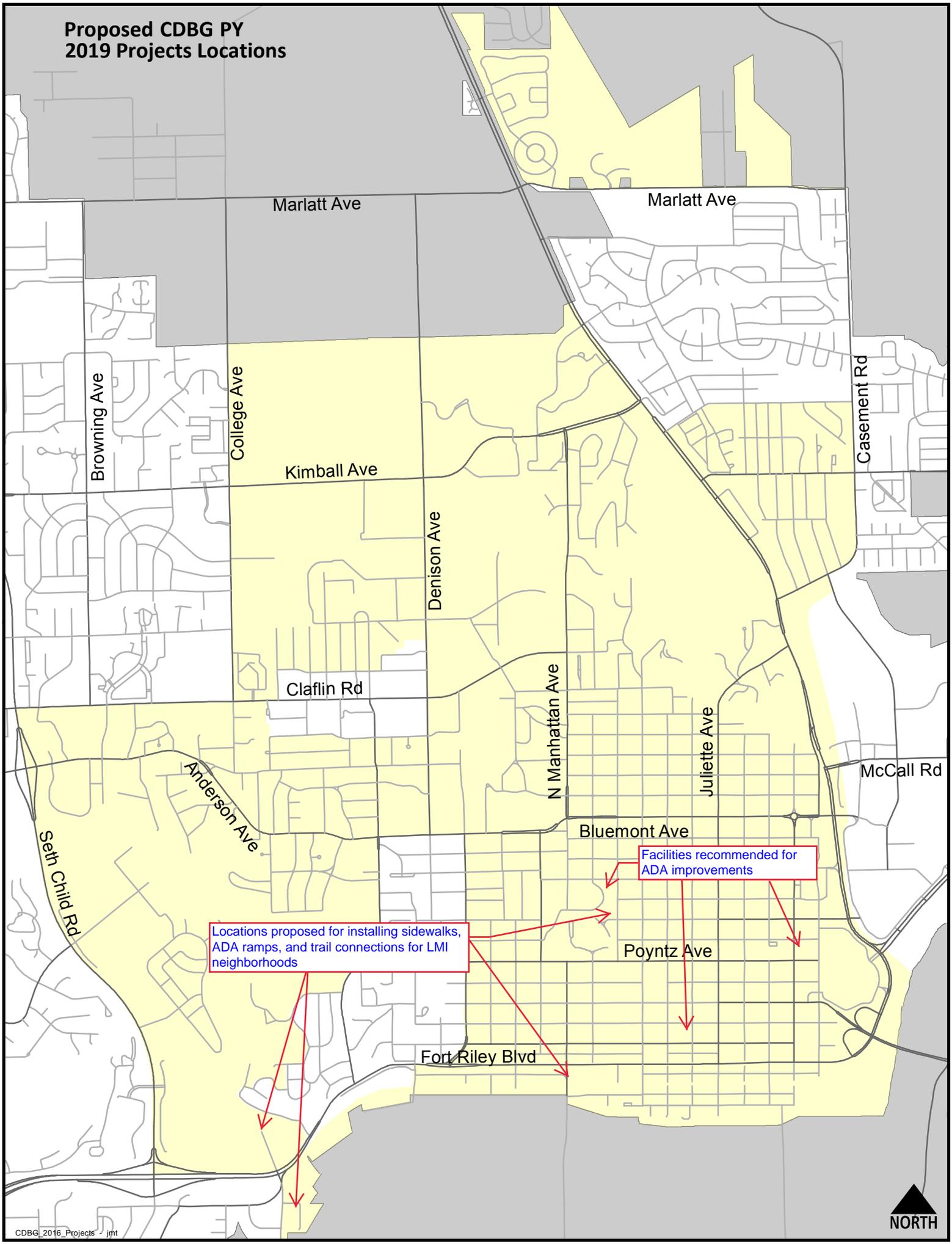
CDBG 2019 Proposed Investment Budget

CDBG Allocation	\$556,213
Grant Administration & Planning	\$111,038
Housing Rehabilitation	\$177,550
Public Services	\$83,325
Public Facilities	\$49,300
Neighborhood Infrastructure	\$135,000
Total Proposed CDBG Program	\$556,213

Questions and comments may also be submitted in writing to **Christina L'Ecuyer, Grant Administrator** in the Community Development Department; by phone at (785) 587-2430; or by email to: lecuyer@cityofmnhk.com.

 This meeting is being held in the City Commission Room at City Hall. In accordance with provisions of the ADA, every attempt will be made to accommodate the needs of persons with disabilities. Please contact the Human Resources Department (587-2443) for assistance.

Proposed CDBG PY 2019 Projects Locations



Locations proposed for installing sidewalks, ADA ramps, and trail connections for LMI neighborhoods

Facilities recommended for ADA improvements

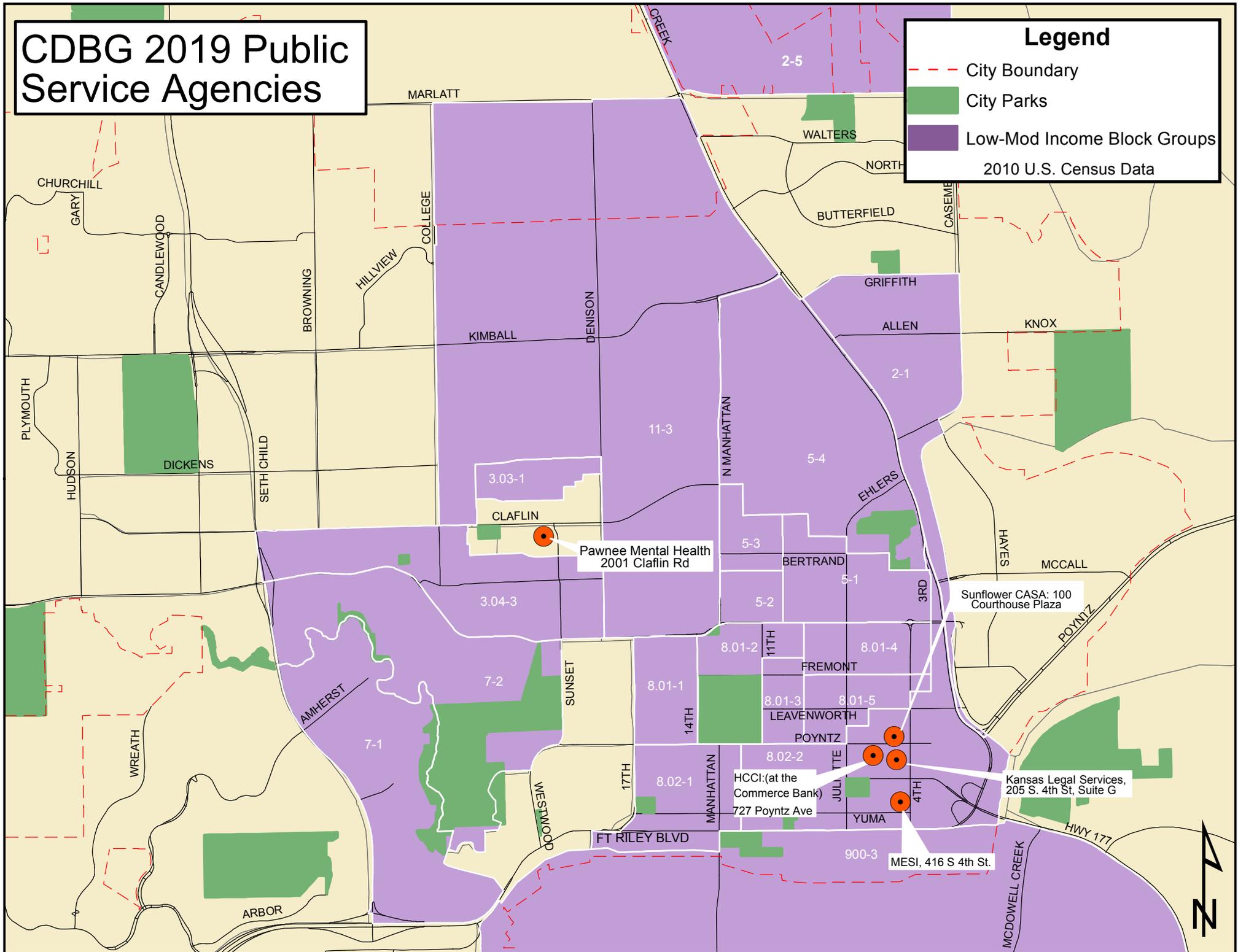


CDBG 2019 Public Service Agencies

Legend

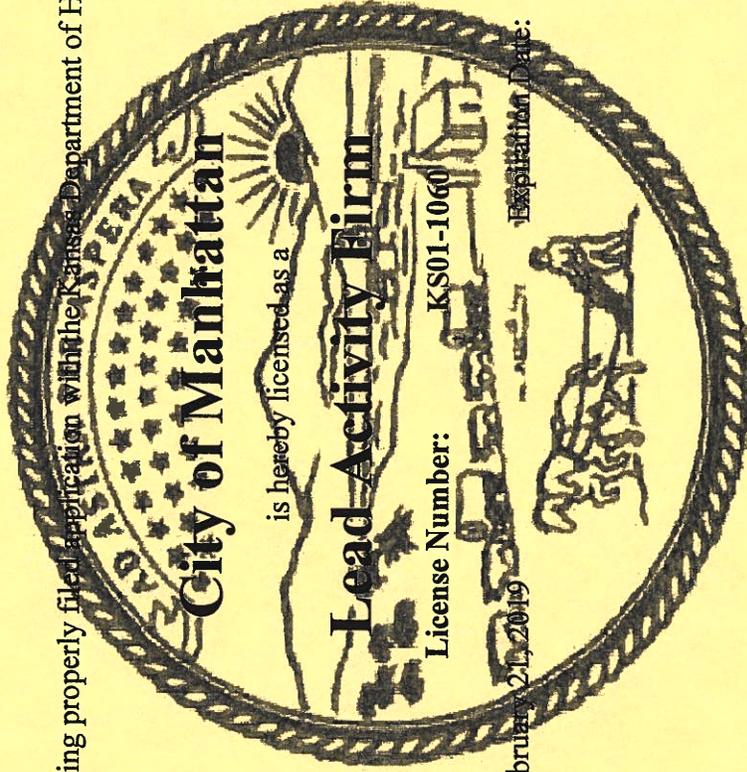
-  City Boundary
-  City Parks
-  Low-Mod Income Block Groups

2010 U.S. Census Data



Kansas Department of Health and Environment

Be it known, that having properly filed an application with the Kansas Department of Health and Environment,



Issue Date: February 21, 2019 Expiration Date: April 14, 2021

Lee A. Norman M.D.

Lee A. Norman, M.D., Acting Secretary
Kansas Department of Health and Environment



**Analysis of Impediments to Fair Housing
2015-2019**



Analysis of Impediments to Fair Housing 2015-2019

Introduction

In order to participate in the Community Development Block Grant (CDBG) program, the U.S. Department of Housing and Urban Development (HUD) requires that the City of Manhattan (the City) commit to *Affirmatively Further Fair Housing Choice*. All jurisdictions receiving CDBG funds must prepare an Analysis of Impediments to Fair housing choice, develop strategies and activities to overcome the effects of identified impediments and maintain records that reflect the analysis and actions. Fair housing choice activities in Manhattan will be funded with the City's CDBG allocation.

Impediments to fair housing are defined as any actions, omissions, or decisions taken because of race, religion, sex, disability, familial status or national origin that have any effect of restricting housing choice or the availability of housing choice.

This Analysis of Impediments reviews the City's laws, regulations, administrative procedures and practices, to assess how these may affect the location, availability and accessibility of housing. It also examines forces, public and private, which may affect fair housing choice for all protected classes within the City.

Methodology and Participants

The City's Community Development Department staff conducted the Analysis of Impediments during the development of the 2015-2019 Consolidated Plan. Information was gathered from numerous departments, agencies and data sources as shown below, and reviewed for relevance to this analysis.

- U.S. Census Bureau
- U.S. Department of Housing and Urban Development
- City of Manhattan: Human Resources and Code Services Departments
- City of Manhattan: Community Development Zoning Ordinance
- Riley County: Economic Development Office and Appraiser's Office
- Manhattan Housing Authority
- Manhattan Area Housing Partnership, Inc.
- Labor Market Information Services, Kansas Department of Labor
- Kansas Human Rights Commission, *Annual Reports 2009 Et Seq.*
- Kansas State University (KSU) Registrar's Office & Office of Dining & Housing
- Fort Riley Plans, Analysis & Integration Office, *Economic Impact Study 2013*

While this analysis specifically addresses Fair Housing in Manhattan only, the City is also collaborating with the Flint Hills Regional Council (FHRC) on a Fair Housing and Equity Assessment (FHEA)/Regional Analysis of Impediments (RAI). That housing study will include the counties of Geary, Lyon, Morris, Pottawatomie, Riley, and Wabaunsee, and is made possible through a grant from the Office of Sustainable Housing & Communities of the U.S. Department of Housing & Urban Development.

City of Manhattan Background Data

Geography

Manhattan is located in Northeastern Kansas approximately 120 miles west of Kansas City, with an area of approximately 19 square miles. The majority of the Manhattan city limits lie in southeastern Riley County, with a small portion of the City in southwestern Pottawatomie County. Within the city limits, all of Manhattan's residential areas are in Riley County.

Population

According to the 2009-2013 American Community Survey estimate, Manhattan's population was 54,082 persons, a 31% increase in population since 2000. The composition of residents in Manhattan is very unique given the presence of Kansas State University and the Fort Riley Military Post. The ACS estimates shows 16.5% of Manhattan's population were members of minority groups, 5.8 % were Hispanic or Latino and 8% were foreign born. People identifying as Hispanic/Latino for all races represented a 2% increase in population, people identifying as Asian increased 1.7% and people who identified as two or more races increased 1.6%, while the percentage of people who identified as white dropped 3%. Only 5.7% of the population identified as veterans.

2013 Estimated Population by Minority Status	Manhattan		KSU Fall 2014	
	Number	Percent	Students	Percent
All Persons	<u>54,082</u>	<u>100.00%</u>	<u>21569</u>	<u>100.00%</u>
White	45,790	84.70%	16,147	74.86%
Black or African American	3,145	5.80%	759	3.52%
American Indian and Alaska Native	216	0.40%	71	0.33%
Asian	2,860	5.30%	304	1.41%
Native Hawaiian and Other Pacific Islander	9	0.00%	23	0.11%
Two or More Races	1,753	3.20%	606	2.81%
All Other Races/Unspecified	955	.60%	321	1.49%
International Students with Visas at KSU			2,125	9.85%
Hispanic (all races)	1,963	5.80%	1,213	5.62%

Source: U.S. Census Bureau and KSU Registrar's Office

Manhattan has a diverse community of foreign born persons representing 8% of the total population, and nearly 10% of the Kansas State University population. Of all foreign born persons in Manhattan in 2013, 59% were from Asian nations, 19% were from Latin American nations, 15% were from European nations, and 5% were from an African nation. The remaining 2% were from various other nations.

Language

Among people at least 5 years of age living in Manhattan, 9 percent spoke a language other than English at home. Asian and Pacific Islander languages represented 38.7%, Spanish languages represented 32.7% and 20.5% spoke an Indo-European language. Approximately 8% spoke some other language.

Age

As of the 2009-2013 ACS more than half of Manhattan's population (52.3%) was 24 years of age and younger, 39.8% were between the ages of 24 and 64, and 7.2% of the population was over age 65. The percentage of population between ages 19 and 65 was 80%.

Disability

Among non-institutionalized people in Manhattan in 2009-2013, 6% reported a having a disability. The reporting varied by age: 28% of people 65 and older, 4% of people age 18 to 64, and 3% of ages 18 and younger reported as disabled.

Education

Manhattan is well educated as 96% of residents over age 18 have at least earned a high school diploma, 52% have a Bachelor's degree and 25% have a Graduate degree. An estimated 4% did not graduate high school.

Households

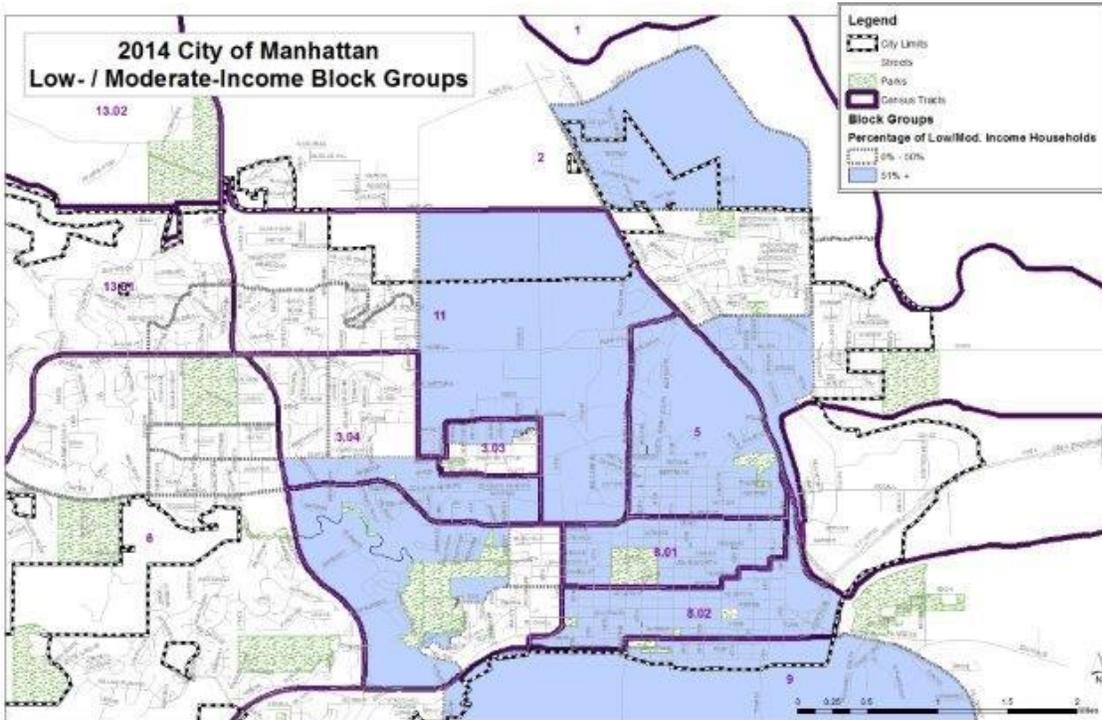
Manhattan is primarily composed of small household arrangements. Nearly 70% of all households consist of 1 to 2 occupants. Families of all types make up 47% of households, and householders living alone represent 32.1% of all households and 21% of households are other non-family arrangements.

Income

The 2013 ACS data indicates that the Manhattan, Kansas MSA Median Family Income (MFI) was \$42,483. In 2013, 27% of all Manhattan residents had income below the poverty threshold for the previous 12 months.

Approximately 41% of households earned less than the 80% of the Riley County Median Family Income and are therefore classified as Low and Moderate Income (LMI) households. While still significant, it reflects a decrease from 2007-2009 measure of 48% earning less than 80% of the Median Income. Male Median Income was 20% higher than Female Median Income. Female head of households

with related children under the age of 18 represented nearly 29% of the families whose income was below the poverty level.



2010 Census

Employment

The 2013 ACS data indicates that the Manhattan, Kansas MSA had 46,617 people who were age 15 and over. Approximately 66% of these people were in the labor force and 34% were not in the labor force with 16% identifying as retired. Of the entire employed labor force, 61% were private salary and wage workers, 35% were federal, state, or local government workers and 4% were self-employed. The City's largest employers are Kansas State University, Fort Riley, USD383, GTM Sportswear and Mercy Regional Health Center (Via Christi).

Fort Riley is a United States Army installation 15 miles west of Manhattan with a total population of approximately 50,453 including off post dependents, employees, and retirees. The current military strength of approximately 17,500 soldiers is expected to shrink to approximately 16,000 due to restructuring of units Army wide. However, with the end of overseas deployments, the Army expects longer local deployments and a stable number of families accompanying their soldiers.

Fort Riley employs 6,522 civilians who consist of Department of the Army (DA) civilians, Federal and Non-Federal civilian employees, and contractors. Civilian employment at the Fort is also expected to see reductions as soldiers returning from deployment overseas resume functions currently held by civilian contractors and as construction of the New Fort Riley Hospital is completed in 2015.

Top Six Employers	Goods or Service	No. of Employees
Fort Riley Military Base	Military Training	17,500
Kansas State University	Higher Education	6,028
Fort Riley Civilian Personnel	Civil Service	6,522
USD #383	Public Schools	1,350
GTM Sportswear	Retail & Manufacturing	900
Mercy Regional Health Center	Hospital	795

Source: Riley County Economic Development and Fort Riley Plans, Analysis and Integration Office, EIS 2014

In 2012, it was determined that the National Bio- and Agro-defense Facility (NBAF) would be located in Manhattan. NBAF will be a state-of-the-art bio-containment facility for the study of foreign animal, emerging and zoonotic (transmitted from animals to humans) diseases that threaten the U.S. animal agriculture and public health. In 2015, construction began on the main laboratory facility, with commissioning expected sometime in 2021. While under construction, the facility is expected to support 750 jobs in the Manhattan economy and approximately 300 permanent full time federally funded positions at completion in 2021.

Housing Profile

According to the 2009-2013 ACS, Manhattan had 22,198 housing units, of which 20,338 were occupied. Housing type consisted of 49% single family structures, 47% multi-unit structures and 4% mobile homes. Approximately 56% of housing was built before 1979. Forty-seven percent (47%) of all multi-unit structures have 3 or more bedrooms. Sixty one percent (61%) of housing units were tenant-occupied and 39% owner-occupied. In 91% of all housing units, there was 1 occupant per room. The vacancy rate was 1.5% for all single family units and 6.9% for rentals.

Nationally, Manhattan ranks in the 98 percentile of renters to owners. The high percentage of rental housing in Manhattan can be attributed to the impact of Kansas State University and Fort Riley.

The U.S. Department of Housing and Urban Development (HUD) helps low-income households rent affordable units through a subsidy program called Section 8. The Section 8 program relies on a combination of data from private rental market rates and local housing market conditions to determine an affordable rate, called the Fair Market Rate (FMR), for two-bedroom units. Nationally, two-bedroom units account for 43 percent of the rental stock. Being the most common unit, they are the easiest units for which to obtain data. HUD estimates FMRs for efficiencies, one-bedroom units, three-bedroom units, and units of other sizes using the two-bedroom estimate as a base which makes the FMR a good barometer of local rental market trends.

Historically in Manhattan, Fair Market Rents (FMR's) have increased an average of 3.19% year over year. The first year in the sample was 1985 when the two-bedroom FMR (for Riley County) was \$275. The FMR for the same 2 bedroom apartment had increased to \$830 by 2013. For comparison, the Median Household Rent (market rate) for a two bedroom in 2013 was \$841. In 2013 the two-bedroom FMR rate in Manhattan saw its largest single year increase going up by 23.33% for a two bedroom apartment.

Listed in the table below are the Fair Market Rents for the Manhattan MSA from 2010, the first year that Manhattan was an Entitlement Community:

FY 2015 Fair Market Rents By Unit Bedrooms					
FMR Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2010	\$ 435	\$ 502	\$ 609	\$ 848	\$ 997
Final FY 2011	\$ 442	\$ 509	\$ 618	\$ 860	\$ 1,011
Final FY 2012	\$ 481	\$ 554	\$ 673	\$ 937	\$ 1,101
Final FY 2013	\$ 627	\$ 631	\$ 830	\$ 1,196	\$ 1,470
Final FY 2014	\$ 594	\$ 598	\$ 786	\$ 1,132	\$ 1,392
Final FY 2015	\$ 586	\$ 590	\$ 776	\$ 1,118	\$ 1,374

Source: HUD FY 2015 Fair Market Rent Documentation System

Fort Riley maintains 3,827 family housing units on base for soldiers and their families and 6,317 barracks spaces for single soldiers which totals to slightly more than half of the housing needed for all soldiers. Approximately 1800 soldiers and 800 civilian employees of the base reside in Riley County. As drawdown of foreign deployments continues, the Army expects longer local deployments and a stable number of families accompanying their soldiers. The decreasing civilian and construction employment on the base will be ameliorated by the increase in construction employment in Manhattan as work on the NBAF begins. Pending any Department of Defense (DOD) base realignments, the effect of the base on the Manhattan housing market for the next 5 years should stabilize.

The Manhattan campus of Kansas State University had 21,569 students enrolled in the fall of 2014, but only had housing for approximately 5,450 individuals and foreign students and their families. The balance of the local campus student population and KSU employees live either in Sororities, Fraternities, or in private housing in Manhattan, the surrounding towns and rural county areas. The demand for on-campus housing has been greater than the supply for the last 5 years and the KSU Office of Dining and Housing is planning for a continued growth of the university from .5% to 1% per year, based on the growth in the high school graduation rate in Kansas. They will open a new 540 bed residence hall starting in

spring of 2015 and are planning for another residence hall and additional apartment bedrooms for the future.

Key housing statistics listed below are from Census and 2013 ACS data for tenant and owner occupied housing.

Tenant Occupied

- **17%** of all rental units are affordable to households with incomes between 50% and 80% of HUD MFI.
- **11%** of all rental units are affordable to households with incomes between 30% and 50% of HUD MFI.
- **2%** of all rental units are affordable to households with incomes less than 30% of HUD MFI.
- **55%** of tenants pay 30% or more of their income to rent.
- **2.2 persons** is the average household size of tenant-occupied units.

Owner Occupied

- **7%** of all units for sale are affordable to households with incomes between 50% and 80% of HUD MFI.
- **72%** of all housing units have mortgage.
- **24%** of homeowners **with** a mortgage paid 30% or more to monthly housing costs.
- **13%** of homeowners **without** a mortgage paid 30% or more to monthly housing costs.
- **2.5 persons** was the average household size of owner-occupied units.
- **\$180,000** was the median price for a home in Manhattan, Kansas in 2013.

Housing Problems:

The four categories of Housing Problems defined by HUD are described as lacking a complete kitchen, lacking complete plumbing facilities, more than 1 person per room, or cost burden greater than 30%.

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate higher than 10% of the rate for the Adjusted Median Income (AMI) level as a whole. Income classifications are as follows:

- Extremely low income: 0% - 30% of AMI
- Low income: 31% - 50% of AMI
- Moderate income: 51% - 80% of AMI

The table below summarizes the 2007-2011 CHAS data percentage difference of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Income levels.

Summary of Populations With One or More Housing Problems				
Racial/Ethnic Group	0-30% AMI	31-50% AMI	51-80% AMI	81-100% AMI
Jurisdiction as a whole	95.3%	82.4%	48.0%	17.2%
White	94.4%	83.3%	48.9%	17.1%
Black / African American	100.0%	84.2%	50.0%	9.5%
Asian	100.0%	60.0%	35.7%	40.0%
American Indian, Alask Native	0.0%	0.0%	0.0%	0.0%
Pacific Islander	100.0%	0.0%	0.0%	0.0%
Hispanic	100.0%	72.6%	46.2%	0.0%

According to HUD 2011 ACS data, no single race or ethnicity disproportionately experienced the housings problems of sub-standard housing, overcrowding or cost burden. However, data reveals cost burden was the most severe housing problem for all races and ethnicities.

Condition of Rental Housing

The Code Services Division of the Manhattan Fire Department investigates all complaints regarding rental housing condition. Landlords are advised when corrective action must be taken and remediation is pursued for issues that involve health and safety. If issues are not addressed, the City may take enforcement actions as allowed by ordinance and adopted code.

Lead Based Paint

According to the ACS data, 55% of all housing units in Manhattan were built prior to 1979. The City assumes that any structure built prior to 1978 contains lead-based paint, and any housing rehabilitation performed by the City will include a lead based paint risk assessment. Based on the results of the assessment, hazards are identified followed by lead safe practices at qualified sites and control options are reported. Contractors are required to follow lead-safe work practices. Additionally, all general contractors who successfully bid projects are required to be State authorized as lead activity firms, must employ certified lead safe workers, and are monitored by a certified lead based paint inspector. The City of Manhattan will continue to use lead safe work practices in all rehabilitation activities pursuant to 40 CFR 745.80 subpart E.

Ownership Market

The homeowner rate has declined over the last 5 years by 4%; however, the vacancy rate for single family homes has declined slightly to 1.5%, suggesting that

some single family housing stock has been converted to rental units. The local real estate market has fluctuated with regard to the number of annual sales and the changes in prices since 2006. However, the average cost of a home never declined through the housing crisis experienced in most parts of the nation in 2007-2009. The median housing costs for mortgaged owners was \$1,422 in 2013.

Manhattan Ownership Market								
	2007	2008	2009	2010	2011	2012	2013	2014*
Homes Sold	704	628	616	584	587	655	701	671
Avg. Price	\$183,339	\$184,760	\$186,423	\$193,186	\$189,505	\$195,495	\$197,495	\$208,933

Source: Riley County Appraiser's Office, includes single family homes and townhomes sold in valid open market transactions only.

* As of December 1st, 2014

Housing Stock Condition

According to the 2009-2013 ACS, approximately 55% of Manhattan's housing stock was built prior to 1979. Of the entire housing stock, only 0.8% of units were without complete plumbing facilities, and 1.3% of units were without complete kitchen facilities. This is an increase from the previous 5 years (.29% and .14% respectively). This may be due to conversion of older homes into apartment units, where a common area is shared by tenants.

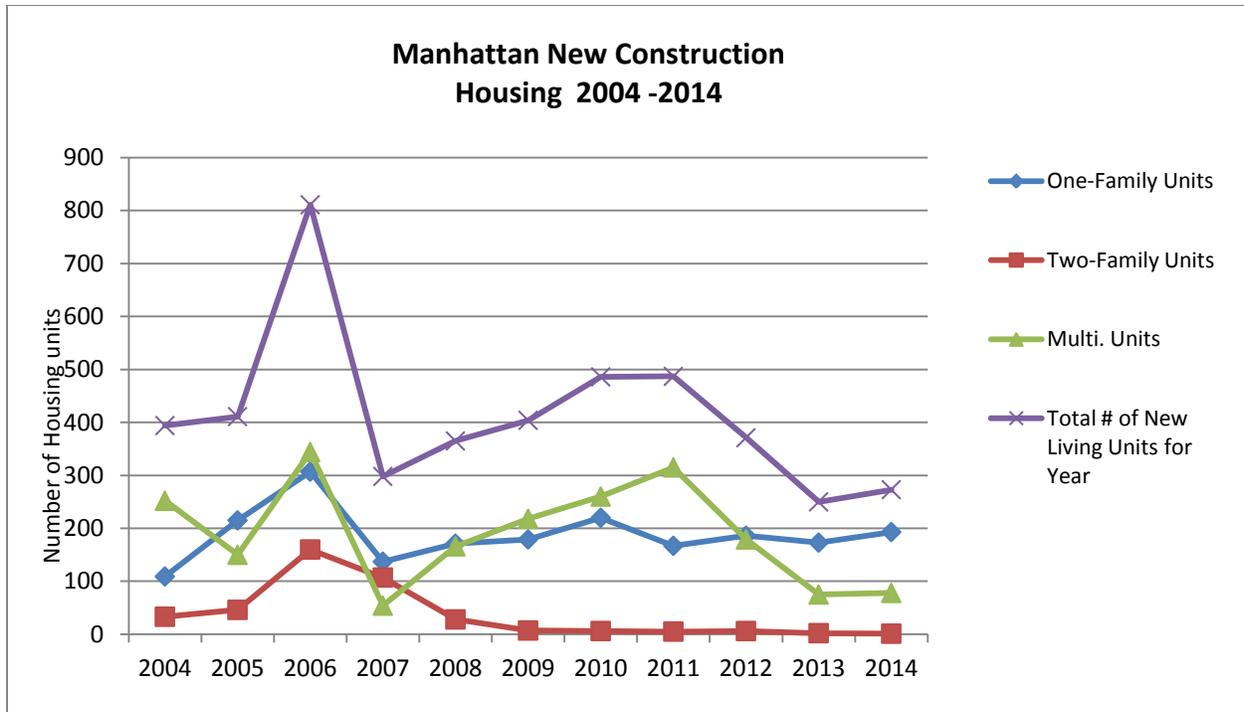
Overcrowding is increasing in the Manhattan community. Only 2.4% of units were identified as overcrowded (greater than 1 person per room) in the 2000 Census while 10.1% were identified as overcrowded in 2009-2013 ACS.

New Construction

The City continues to work with private developers to provide housing choices. The Manhattan Urban Area Comprehensive Plan identifies locations for a variety of housing types throughout the community. As developers propose annexation and zoning applications, they are reviewed on a timely basis by the Planning Board and Manhattan City Commission.

The City also utilizes a Capital Improvements Plan to identify and fund public infrastructure projects that support a wide variety of housing development.

New construction activity in Manhattan had been on an upward trend until the national real estate and economic downturn in 2007 began to affect the area. New construction permits had rebounded until 2011 then experienced a general downturn in activity, related to slow sales of existing homes. New permits (in all housing units) reached its highest mark since the housing crisis at the end of 2010, then the number of new permits issued decreased each year through 2013. In 2014, the trend ticked up and is forecast to increase again slightly in 2015.



Source: Manhattan Code Services Department, Jan 2015

Over the past several years, the City has encouraged the development of new multi-family housing units in various ways, which has resulted in an increased supply of rental housing, and a healthier vacancy rate. Since 2002, eight affordable multi-family tax credit units have been developed by the Manhattan Area Housing Partnership, Inc., a local CHDO, and other private partners. The City has acted positively on Resolutions of support for these projects and in some cases, waived building permit fees and utility hookup fees.

Manhattan Housing Authority

The Manhattan Housing Authority (MHA) is governed by a seven-member policy making Board of Commissioners, appointed by the Mayor, with the consent of the City Commission. Day-to-day operations are managed by an Executive Director and 15 staff members. In 2013, the MHA operated 202 1-4 bedroom units in five public housing communities and managed an additional 106 units in two tax credit housing communities. Since 2011, the MHA has been designated as a "High Performer" in the Section 8 Housing Choice Voucher Program, providing the maximum amount of assistance to the Manhattan Community. The MHA is also responsible for the disbursement of 197 Section 8 Housing Choice Vouchers, 30 Veterans Affairs Supportive Housing Voucher and 25 Family Reunification Vouchers.

The mission of the MHA is to assist income qualified persons with decent, safe and affordable housing in an efficient, ethical and professional manner. Financial

solvency has been a key factor in carrying out this mission. MHA policies will be followed consistently and will affirmatively further HUD’s fair housing goals.

In 2014, the MHA was awarded a Capital Fund Reserve for Emergencies and Natural Disasters (Emergency Funds) grant to renovate the Apartment Towers, the first high rise in Manhattan that is also a public housing unit. The funds from this grant will largely be allocated towards basic interior renovations, and removal of mold and asbestos.

Manhattan Area Housing Partnership, Inc.

The Manhattan Area Housing Partnership (MAHP), Inc. is a Community Housing Development Organization (CHDO) dedicated to bringing quality affordable housing to the Manhattan community as well as dedicated specialized services to low/moderate income persons (LMI) through their Financial Assurance Program.

The Financial Assurance Program assists Social Security and Veteran’s Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third party payee. Staff works directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence.

MAHP owns and operates low income housing developed with HUD HOME funds and low income housing tax credits received from the Kansas Housing Resources Corporation. The MAHP owns 159 affordable units in seven developments and manages 53 units in five of them. MHA manages the other 106 units in 2 developments for the MAHP. The MAHP also collaborated with the MHA in the first joint venture in Kansas with the development of the Flint Hills Apartments, a public housing and tax credit venture. The MAHP accepts Section 8 vouchers from the MHA and the North Central Flint Hills Area Agency on Aging and Disabilities.

Manhattan Housing Authority Public Housing Family Demographics

White	68.40%
Black or African American	26.71%
Asian	1.95%
American Indian and Alaska Native	0.98%
Native Hawaiian and Other Pacific Islander	0.33%
Two or More Races	1.63%
Hispanic (all races)	7.16%
Female Head of Household	70.03%
Average number of family members	1.92

Tax Credit (Affordable) Housing Family Demographics

White	66.67%
Black or African American	32.26%
Two or More Races	1.08%
Hispanic (all races)	10.75%
Female Head of Household	81.72%
Average Number of family members	2.68

Evaluation of Manhattan's Current Fair Housing Activities

Fair Housing Enforcement

The City created the Manhattan Human Relations Commission in 1964. At a later date the name was changed to the Manhattan Human Rights and Service Board. The local ordinance that created the Board authorizes it to "receive and investigate complaints of discrimination in housing, employment, and public accommodations." The protected classes mirror the federal and state statutes; however, the local ordinance adds military status as a protected class.

Based on data from the Manhattan Human Rights and Service Board, as well as the Kansas Human Rights Commission, there has been one disability discrimination complaint regarding housing filed within the City since 2010. This claim was found to be without merit, as the housing provider proved it was within their policies, the law, and HUD practices.

HUD also investigates housing complaints in Manhattan. From 2010 to 2013, HUD received a total of 11 discrimination complaints of which 5 were based on race, 1 on sex, and 4 on disability.

In 6 of these cases, a "No Cause Determination" was issued by HUD, meaning the investigation revealed no evidence to support the Complainant's allegation(s) of discrimination against the Respondents. In 3 of these cases, the parties agreed to settle the case, signed a Conciliation Agreement, and the Complainant received relief (i.e., monetary, housing, change in policy, etc.). In 2 of the cases, the Complainant worked out a resolution to the complaint with the Respondent and withdrew the complaint.

Identification of Impediments to Fair Housing Choice

Zoning and Subdivision Regulations

There are no known negative effects of City Zoning and Subdivision regulations in regards to affordable housing and residential investment.

The City implements its planning and zoning authority through the Manhattan Urban Area Comprehensive Plan, the Manhattan Urban Area Subdivision Regulations and the Manhattan Zoning Regulations. The Manhattan City Commission adopts and updates the comprehensive plan and other policy documents for the Board's jurisdictional area, and formulation of Subdivision and Zoning Regulations for the City.

The City has recently updated the Comprehensive Plan for the Manhattan Area through 2035. It contains elements which promote neighborhoods that contain a mix of land uses and diversified housing options to serve a growing and changing population, including housing that is affordable and design that allows for multi-

modal connectivity between adjacent neighborhoods, commercial areas, parks and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the Manhattan Urban Area and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use. New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

Providing healthy, livable neighborhoods that offer a variety of lifestyle options is based on the following guiding principles:

- Expanded housing options to meet the needs of a changing community;
- Revitalization of established and core area neighborhoods; and
- Access to amenities that encourage active and healthy lifestyles.

Building Codes

There are no known negative effects of City Building Codes in regards to affordable housing and residential investment.

The City has adopted the 2012 International Building Code Series, and the 2011 National Electrical Code. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Code Services Division of the Manhattan Fire Department ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act.

Manhattan Housing Authority

The MHA follows the procedure set forth in its Tenant Selection and Waiting List Management Plan, pursuant to the requirements of [24 CFR 960.204.] In filling an actual or expected vacancy, the MHA offers the dwelling unit to an applicant in the appropriate sequence, with the goal of accomplishing de-concentration of poverty and income-mixing objectives. The number and types of families on waiting lists for public housing and section 8 tenant-based rental assistance change with the circumstances of the applicants and the availability of housing.

Private Sector Lending

Beginning in 2010, local lending institutions became subject to federal reporting as required by the Home Mortgage Disclosure Act (HMDA) and the Federal Financial Institution Exam Council (FFIEC) for all Metropolitan Statistical Areas (MSA). Current data from the FFIEC show that there are no underserved census tracts in the City.

2014 FFIEC Census Report - Summary Census Demographic Information

County Code	Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2014 Est. Tract Median Family Income	Tract Pop.	Tract Minority %	Minority Pop.	Owner Occupied Units	1- to 4-Family Units
161	2	Middle	No	89.72	\$59,754	9017	19.69	1775	2250	3211
161	3.03	Moderate	No	77.24	\$51,442	2642	21.35	564	61	312
161	3.04	Middle	No	97.78	\$65,121	5013	15.8	792	562	1113
161	5	Middle	No	105.48	\$70,250	4968	16.12	801	357	1683
161	6	Upper	No	144.43	\$96,190	7779	19.82	1542	1648	1921
161	7	Moderate	No	62.43	\$41,578	4188	17.05	714	1015	1854
161	8.01	Moderate	No	79.22	\$52,761	4253	16.84	716	226	1226
161	8.02	Moderate	No	63.52	\$42,304	2172	25.92	563	273	1037
161	9	Middle	No	106.05	\$70,629	5707	20.87	1191	1129	2118
161	11	Middle	No	106.62	\$71,009	8616	23.08	1989	860	1026
161	13.01	Upper	No	124.64	\$83,010	2984	22.69	677	530	613

The Community Reinvestment Act (CRA) is a United States federal law designed to encourage commercial banks and savings associations to help meet the needs of borrowers in all segments of their communities, including low-and moderate-income neighborhoods. There are 19 financial institutions in the City that originate loans and all have a Community Reinvestment Act (CRA) rating of satisfactory or higher.

The tables below examine dispositions of applications for conventional loans by race, ethnicity, and income.

HOME MORTGAGE DISCLOSURE ACT FOR: MSA/MD: 31740 - MANHATTAN, KS

DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 2013

1- TO 4-FAMILY AND MANUFACTURED HOMES BY RACE, ETHNICITY, AND INCOME OF APPLICANT

RACE:	Applications Received	Loans Originated	App's. Approved But Not Accepted	App's. Denied	App's. Withdrawn	Files Closed For Incompleteness
AMERICAN INDIAN/ALASKA NATIVE	6	4	1	1		
ASIAN	61	55	2	2	2	
BLACK OR AFRICAN AMERICAN	14	8	1	5		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	4		1	2	1	
WHITE	898	661	56	117	51	13
2 OR MORE MINORITY RACES						
JOINT (WHITE/MINORITY RACE)	48	42	3	2	1	
RACE NOT AVAILABLE	96	79	9	7	1	

(Cont'd)	Applications Received	Loans Originated	App's. Approved But Not Accepted	App's. Denied	App's. Withdrawn	Files Closed For Incomplete ness
ETHNICITY AND INCOME						
HISPANIC OR LATINO	25	15	4	5	1	
NOT HISPANIC OR LATINO	973	743	54	112	51	13
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	15	11	2	2		
ETHNICITY NOT AVAILABLE	114	80	13	17	4	
MINORITY STATUS						
WHITE NON-HISPANIC	848	636	49	103	47	13
OTHERS, INCLUDING HISPANIC	167	131	12	19	5	
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA/MD MEDIAN	84	44	8	32		
50-79% OF MSA/MD MEDIAN	176	123	19	28	5	1
80-99% OF MSA/MD MEDIAN	135	85	8	29	9	4
100-119% OF MSA/MD MEDIAN	114	88	5	14	6	1
120% OR MORE OF MSA/MD MEDIAN	549	445	30	33	34	7
INCOME NOT AVAILABLE 6/	69	64	3		2	
TOTAL	1127	849	73	136	56	13

Report Date: 06/02/2014

Assessment of Impediments to Fair Housing Choice

Analysis of public sector policy indicates that there appears to be no institutional impediments to fair housing choice. Regulations that are designed to protect the health, safety and welfare of citizens may affect the cost of housing; however, these regulations are not designed to discourage choice or availability of housing. Therefore, the City does not propose actions or reform steps to remove or restructure such policies.

Analysis of both qualitative and quantitative data on housing in Manhattan resulted in the identification of the following impediments to fair housing choice:

Affordability

Data suggests that there may be a disparity between income and the cost of housing in the City. The U.S. Census Bureau shows that 41% of the population is considered Low and Moderate Income by HUD standards, and CHAS information reveals that only an approximate 30% of the available housing stock is affordable to LMI persons.

Accessibility

The economic feasibility of retrofitting older housing stock for accessibility improvements may be an impediment to both landlords and to Low and Moderate Income homeowners. The City performs accessibility rehabilitation for LMI homeowners as one of its CDBG Housing Rehabilitation activities. The Manhattan Housing Authority (MHA) integrates the needs of disabled individuals into their daily operations

Fair Housing Education

There may be a lack of knowledge in the community regarding Fair Housing laws, or where to find such information. Landlords and tenants need to be educated on fair housing rights and responsibilities, particularly the Service Members Relief Act given the influence of Fort Riley on the Manhattan housing market.

Actions to Address Public and Private Fair Housing Choice

To address identified impediments, the City of Manhattan will continue the following activities to affirmatively further Fair Housing Choice:

- Provide Fair Housing brochures, advertisements, radio ads and displays
- Provide Fair Housing public seminars to educate landlords and tenants.
- Continue to work closely with Kansas State University and Fort Riley to promote Fair Housing education and practices.
- Encourage local developers to create and maintain affordable housing.
- Support Fair Housing Month activities.
- Encourage efforts to deconcentrate public housing.
- Continue to administer the Manhattan Housing Rehabilitation Program to maintain existing affordable housing stock, address emergency repairs and to increase the accessibility of housing units available.
- Periodically review zoning and subdivision regulations to determine the effect, if any, on housing affordability and accessibility.
- Encourage and support neighborhood revitalization.