

**FY 2016
CDBG “DRAFT” ACTION PLAN
FOR
MILLCREEK TOWNSHIP
ERIE COUNTY, PA**

Prepared For:
MILLCREEK TOWNSHIP
3608 West 26th Street
Erie, PA 16506

Prepared By:
ERIE COUNTY DEPARTMENT OF PLANNING
150 East Front Street, Suite 300
Erie, PA 16507
(814) 451-7330

PUBLIC COMMENT PERIOD
March 24 to April 22, 2016

FINAL PUBLIC HEARING
April 21, 2016

“DRAFT” ACTION PLAN

FY 2016 MILLCREEK TOWNSHIP CDBG

INTRODUCTION

This document represents Millcreek Township’s “Draft” CDBG Action Plan for FY 2016. It identifies the amount of CDBG funds the Township is eligible to receive /apply for from HUD and how the Township proposes to use the grant monies.

Pursuant to the Township’s Citizen Participation Plan, this “Draft” Action Plan is being made available for public review and comment for a thirty (30) day period – March 24 through April 22, 2016. Any comments, concerns, or questions should be directed to:

Mr. Joseph T. Berdis, CDBG Administrator
Erie County Department of Planning
150 East Front Street, Suite 300
Erie, PA 16507
Phone: (814) 451-7330
Fax: (814) 451-7000
jberdis@eriecountypa.gov

Additionally, a final public hearing has been scheduled for 10:00 AM on Thursday, April 21, 2016 in the Assembly Room of the Millcreek Township Municipal Building.

BACKGROUND INFORMATION

Millcreek Township is entitled to apply for and receive Community Development Block Grant (CDBG) monies each year from the U.S. Department of Housing and Urban Development pursuant to the provisions of Title I of the Housing and Community Development Grant of 1974, as amended. The Township became a HUD entitlement municipality in 1998 when it surpassed 50,000 in population and since 1998 has received approximately \$4.8 million in CDBG funding (see Exhibit 1). The Township’s CDBG program is administered by the Erie County Department of Planning (ECDP).

The Township’s FY 2016 allocation will be \$234,020. This is an increase of \$18,145 or 8.4% above last year’s grant of \$215,875. The deadline for the Township to submit its application to HUD is May 19, 2016 with a program start date of July 1, 2016.

The Township’s CDBG funds are to be used to undertake activities which address community development and/or housing needs as identified in the Township’s Five Year Strategic Plan (*See Exhibit 2 for Summary*) and which meet at least one (1) of three (3) National Objectives of the CDBG program:

- ✓ Principally benefit low-to-moderate income persons
- ✓ Aid in the prevention or elimination of slums and blight
- ✓ Meet a community development need having a particular urgency because existing conditions pose a serious and immediate threat to the health and welfare of the community and other financial resources are not available to meet the need.

Of the three (3) objectives, the *primary objective* is to Principally Benefit Low- to-Moderate Income (LMI) persons and at least 70% of the grant monies must go towards this effort. A LMI person is one who’s income is 80% of the area’s median income (AMI).

Each fiscal year agencies, groups and organizations which assist residents of Millcreek are provided an opportunity to request a share of the funding. Application packets were mailed out on January 14, 2016 to several groups and a public hearing was held on February 3, 2016 to explain the program and solicit

input on potential projects. Those seeking funding had until February 19, 2016 to submit a request to the ECDP.

The applicants, projects, funding requests and recommendations are presented below. The requests were actually less than the amount of funding available, most likely because it was not anticipated that there would be an increase in the allocation over the previous year. All of the proposed projects meet the “eligibility” and “fundability” requirements of the CDBG program.

As shown below, all of the projects are being funded. Because three (3) are for *administration*, and there is a cap of 20% for administration, one of the projects had to be reduced by \$296 (HRC/Fair Housing Testing). Also, because of the larger than anticipated allocation, the Phase V Sidewalk Accessibility Project is being funded at \$17,216 above the original request. A brief description of each of the proposed projects can be found on the following pages.

APPLICANT	PROJECT/ TYPE OF ACTIVITY	FUNDING REQUEST	FUNDING RECOMMENDED
Millcreek Township	Sidewalk Accessibility Project – Phase IV/ Public Facilities & Improvements	\$160,000	\$177,216
Erie Center on Health & Aging	Regional Senior Center Operational Support Project/ Public Services	\$ 10,000	\$ 10,000
Housing And Neighborhood Development Service (H.A.N.D.S)	Affordable Housing Planning Project/ Planning -Administration	\$ 11,000	\$ 11,000
Erie County Human Relations Commission	Fair Housing Testing of Rental Housing Project/ Administration	\$ 6,100	\$ 5,804
Erie County Department of Planning	General Program Administration/ Administration	\$ 30,000	\$ 30,000
Total		\$ 217,100	\$234,020

SIDEWALK ACCESSIBILITY PROJECT- PHASE V

[03] Public Facilities & Improvements - / 570.201 (c)

Millcreek Township proposes to allocate **\$177,216** in FY 2016 CDBG funding, plus local monies, for the installation of approximately 140 handicapped curb-cut ramps, as well as temporary asphalt transitions from the ramps to existing roadways, at various locations throughout the Township.

The project is the fifth phase of a multi-phase effort to install curb-ramps in order make pedestrian crossings accessible to people with disabilities. The Township is under a consent decree to replace/install approximately 1,300 ramps by 2022. Beginning with FY 2012 and continuing through and including FY 2014, the township has installed 448 ramps utilizing CDBG funds. An additional 140+ ramps will be installed this summer (2016) utilizing FY 2015 CDBG funding.

The project meets the LMI National Objective of the CDBG program in that it will benefit the handicapped and elderly who are presumed by HUD to be generally low-to-moderate income persons. Additionally, funding of the activity will address a high priority "Community Development Need" [*Infrastructure/Sidewalk Accessibility Improvements*] as identified in the Township's Five Year Strategic Plan.

Background Information

The common curb is one of the most encountered barriers impeding the daily movement of physically disabled and elderly persons. Title II of the American with Disabilities Act (ADA) requires state and local governments to make pedestrian crossings accessible to people with disabilities by providing curb ramps. Without these ramps, sidewalk travel and street crossing can be difficult, dangerous and in some cases impossible for people who use wheelchairs, scooters, and other mobility aids.

Proposed Project

CDBG funds will provide for the installation of approximately 140 handicapped accessible curb-cut ramps, as well as temporary asphalt transitions from the ramps to the roadway, at various locations* throughout the Township. The ramps will be designed in the field to accommodate existing conditions and sidewalks. They will strictly conform to ADA standards regarding running slope and cross slope as well as the inclusion of detectable warning surfaces (truncated domes). A level landing will be required at the transition between the existing sidewalk and new ramp for a turning area. Each ramp will be thoroughly inspected once completed. The contractor will also install an asphalt transition area connecting the newly installed ramp to the existing roadway surface to assure sidewalks are truly accessible. These asphalt transitions will be removed when the roadway is resurfaced by the township at which time compliant crosswalks will be installed.

**No location will be in a designated flood plain.*

Cost Estimate

	Description	Cost
1	Remove, design, and install ramps; including installation of asphalt transitions to roadways (140 ramps x \$1,750 [+/-] per ramp)	\$245,000
2	Mobilization	\$10,000
	TOTAL PROJECT COST	\$255,000**

**CDBG Funding [\$177,216] + Local Monies [\$77,784 +/-] = \$255,000

REGIONAL SENIOR CENTER OPERATIONAL SUPPORT PROJECT

[05A] Public Services- Senior Services -570.201 (e)

Millcreek Township proposes to provide **\$10,000** in FY 2016 CDBG funds to the Erie Center on Health and Aging Inc. (*dba* LifeWorks Erie) to support continued operations of the Regional Senior Center. The funds will be used to underwrite expenses related to salaries and benefits of senior center staff directly responsible for programming and service delivery.

The project meets the LMI National Objective of the CDBG program in that it will benefit the elderly who are presumed by HUD to be generally low-to-moderate income persons. Additionally, funding of the activity will address a high priority "Community Development Need" [*Public Services/Senior Services*] as identified in the Township's Five Year Strategic Plan.

Background Information

The Regional Senior Center represents a merger between the former Millcreek Senior Center and the Erie Center on Health & Aging, both of which are independent, non-profit, 501 (C) (3) corporations. The Erie Center on Health & Aging, Inc. is the corporate merged entity.

The Erie Center on Health and Aging Inc. (*dba* LifeWorks Erie) has its primary location at 4th and Peach Streets in the City of Erie, however, many of the routine services are provided at locations throughout the County, including Millcreek, for convenience and easy access. Participants in the Center's programs come from over twenty (20) County zip codes.

Proposed Project

CDBG funds will be used to support operations of the Center by underwriting expenses related to salaries and benefits of senior center staff directly responsible for programming and service delivery. Programs and services offered by the Center include, but are not limited to the following:

- ❑ Providing social activities that foster group participation and interaction and reduce social isolation, depression and loneliness.
- ❑ Improving health by offering age specific group fitness and wellness activities including walking, Tai'chi, and yoga programs.
- ❑ Improving sense of self-worth, dignity and quality of life through self-enrichment programs including arts, dance, discussion groups, volunteer opportunities, community and civic engagement, and "Lifelong Learning Institute" educational classes.
- ❑ Improving nutritional status through breakfast and lunch programs that also offer nutritional guidance and education.
- ❑ Managing chronic diseases and improving health status through assistance from preventive health nurse/health coaches and health educators, including monthly screening programs, yearly immunization program for influenza and pneumonia (with over 300 clinic sites throughout Erie County), the "Chronic Disease Self-Management program", and podiatry services provided on-site at 8 community locations.
- ❑ Improving access by providing services and programs at multiple, convenient community locations throughout Erie County, including apartment buildings, community centers, and senior centers.

Cost Estimate

	City of Erie	GECAC	United Way	Millcreek CDBG	Millcreek General Fund	TOTAL
Wages	\$8,600	\$106,800	\$49,000	\$9,000	\$15,300	\$188,700
Benefits	\$ 600	\$ 11,200	\$ 4,900	\$1,000	\$ 1,500	\$ 19,200
Supplies	\$3,800	\$ 60,700	\$ 1,300	\$0	\$ 1,000	\$ 66,800
Other	\$0	\$ 31,100	\$ 2,400	\$0	\$ 2,500	\$ 36,000
TOTAL	\$13,000	\$209,800	\$57,600	\$10,000	\$20,300	\$310,700

H.A.N.D.S AFFORDABLE HOUSING PLANNING PROJECT

[20] Planning/Administration / 570.205

Millcreek Township will provide **\$11,000** in FY 2016 CDBG funds to Housing and Neighborhood Development Services (H.A.N.D.S) to undertake a planning study to determine the potential for an affordable housing development for the elderly.

Funding of the activity will address a high priority "Housing Need" [*Support Efforts to Expand the Supply of Assisted Rental Housing*] as identified in the Township's Five Year Strategic Plan. Costs charged to this type of planning activity are presumed to meet a CDBG National Objective.

BACKGROUND INFORMATION

Millcreek Township is a thriving community. The Township's limited supply and high demand for housing, especially rental housing, negatively impacts affordability rates, as occupy-able and vacant apartment homes have the ability to command higher sale prices and rents. The end result is that low-and-moderate income residents are excluded from the market, under housed or housing cost burdened. The supply also fails to meet the needs of those households most severely housing cost-burdened – those with incomes at or below 50% of the area's median income. Many of these households represent the elderly population. The continued population growth and increasing housing demand will cause the Township's supply of affordable housing to further tighten, and low-and-moderate income households will continue to experience a housing cost burden until additional affordable rental housing can be developed.

PROPOSED PROJECT

CDBG funds provided to H.A.N.D.S will enable it to hire a qualified consultant to undertake a planning study to determine the potential for an affordable housing development in the Township for the elderly. Plan components to be paid for with CDBG monies include Site Identification, Property Appraisal, Market Study, Housing Plan/Funding Application, and PHFA LIHTC Application Fee. Information gathered from the study will be used by H.A.N.D.S to complete/submit a Low Income Housing Tax Credit (LIHTC) application to the Pennsylvania Housing Finance Agency (PHFA) for funding to construct a new forty (40) unit affordable senior housing development.

COST ESTIMATE

Budget Item	CDBG Funds	H.A.N.D.S Predevelopment Budget	Total
Site Identification	\$500	\$500	\$1,000
Legal-Site Control/Acquisition	\$0	\$5,000	\$5,000
Survey	\$0	\$10,000	\$10,000
Soils/Structural Report	\$0	\$4,200	\$4,200
Environmental Audit- Phase I	\$0	\$18,000	\$18,000
Energy Audit/Capital Needs	\$0	\$6,000	\$6,000
Property Appraisal	\$3,000	\$6,000	\$9,000
Market Study	\$3,800	\$3,800	\$7,600
Housing Plan/Funding Application	\$1,200	\$3,000	\$4,200
PHFA LIHTC Application Fee	\$2,500	\$2,500	\$5,000
Totals	\$11,000	\$59,000	\$70,000

FAIR HOUSING TESTING OF RENTAL HOUSING PROJECT

[21D] FAIR Housing Activity (subject to Administrative Cap)

Millcreek Township will provide **\$5,804** in FY 2016 CDBG funds to the Erie County Human Relations Commission to test the rental housing community for possible discrimination. Funding of this activity will help the Township fulfill its obligation as a CDBG recipient to "Affirmatively Further Fair Housing." Costs charged to this type of activity are presumed to meet a CDBG National Objective.

BACKGROUND INFORMATION

Testing is a method to determine whether or not a home seeker is treated differently (discriminated against) in his or her search for housing because of characteristics such as race, color, familial status, religious creed, ancestry, age or sex. Typically, testing involves using people with similar profiles, but who differ in one protected characteristic, such as race. Common tests include responding to a rental or sale advertisement and viewing an advertised property. Testing is a legitimate and necessary method of uncovering illegal housing discrimination. Without testing, most housing discrimination goes undetected. Testing is not designed to trap the housing provider or encourage them to discriminate. Testers simply observe and record their experiences, similar to a secret shopper. Some examples of discrimination uncovered in fair housing testing include:

- a) Failure to waive a "no pets" rule (denial of request for reasonable accommodation) for a service animal;
- b) Charging higher rent or security deposits for potential tenants with children; and
- c) Falsely denying availability of an advertised rental unit.

The results of testing could show the need to expand education and outreach on fair housing issues to community members, landlords and social service providers on fair housing issues.

PROPOSED PROJECT

Through this proposed project, the HRC intends to hire a qualified independent entity to test the rental housing community at a minimum of four (4) different sites, testing each site (if practicable) with regard to at least two (2) of the protected classes under its Ordinance: race, color, familial status, religious creed, ancestry, age, sex, sexual orientation, national origin, disability of the person, and the use of guide or support animals because of the disability of the person. The intent of the testing is not to look for fair housing complaints, but to provide a statistical analysis as to the manner in which the individual testers are treated differently by landlords.

COST ESTIMATE

	Description	Cost
1	Advertisement of RFP Notice in Erie Times-News	\$500
2	Testing Services	\$5,304
	TOTAL PROJECT COST	\$5,804

[21A] General Program Administration / 570.206

Millcreek Township will provide **\$30,000** in FY 2016 CDBG funds to the Erie County Department of Planning for overall program management, coordination, monitoring, reporting and evaluation. The amount represents 12.8% of the allocation. HUD allows up to 20% of the allocation for administration.

EXHIBITS

EXHIBIT 1

MILLCREEK TOWNSHIP HUD CDBG PROGRAM ALLOCATIONS
(FY 1998 through FY 2015)

GRANT YEAR	ALLOCATION	+/- (\$) DIFFERENTIAL	% DIFFERENCE
1998	\$307,000	-	-
1999	\$309,000	(+) \$2,000	+ 0.65%
2000	\$306,000	(-) \$3,000	- 0.97%
2001	\$316,000	(+) \$10,000	+ 3.27%
2002	\$306,000	(-) \$10,000	- 3.16%
2003	\$311,000	(+) \$5,000	+ 1.63%
2004	\$302,000	(-) \$9,000	- 2.89%
2005	\$283,944	(-) \$18,056	- 5.98%
2006	\$254,483	(-) \$29,461	-10.38%
2007	\$252,478	(-) \$2,005	- 0.89%
2008	\$241,989	(-) \$10,489	- 4.15%
2009	\$242,161	(+) \$172	+ .007%
<i>2009 (Stimulus \$)</i>	<i>\$65,721</i>	-	-
2010	\$260,948	(+) \$18,787	+ 7.76%
2011	\$217,656	(-) \$43,292	-16.59%
2012	\$195,478	(-) \$22,178	-10.19%
2013	\$210,482	(+) \$15,004	+ 7.68%
2014	\$207,716	(-) \$2,766	- 1.31%
2015	\$215,875	(+) \$8,159	+ 3.92%
TOTAL	\$4,805,931		



EXHIBIT 2

Five Year Strategic Plan Summary

Millcreek Township, Pennsylvania has prepared a new Five Year Consolidated Plan (FY's 2013, 2014, 2015, 2016 and 2017) in order to strategically implement federal programs that fund housing, community development, and economic development activities within the municipality. Through a collaborative planning process, involving a broad range of public and private agencies, the Township has developed a single, consolidated planning and application document for the use of federal entitlement funds available through the Community Development Block Grant (CDBG) Program.

The Five Year CP for Millcreek Township serves the following functions:

- A planning document that enables the Township to view its HUD funding, not in isolation, but as one tool in a comprehensive strategy to address housing, community development, and economic development needs.
- An application for CDBG Program funds under HUD's formula grant.
- A strategy document (Strategic Plan) to be followed in carrying out HUD programs.
- An Action Plan that provides a basis for assessing performance in carrying out use of CDBG Program funds.

Community Development Block Grant (CDBG) funds to address the needs outlined in the Strategic Plan is anticipated to be approximately \$200,000 for each of the next five years. ***The three overarching objectives guiding the proposed activities are:***

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

Outcomes show how programs and activities benefit a community or the people served. ***The three outcomes that will illustrate the benefits of each activity funded by the CDBG program are:***

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All future activities funded in the next five years will support at least one objective and one outcome. ***The Township's framework for realizing the objectives and outcomes include the following goals:***

- Provide decent, affordable housing
- Provide a suitable living environment
- Expand economic opportunities
- Increase homeownership
- End chronic homelessness

During the five year period (2013-2017) covered by the CP, Millcreek Township proposed to undertake the following activities to address its housing and non-housing community development needs. Below is a summary of the needs, goals and accomplishments to date.

HOUSING NEEDS

Need: Housing improvements, including single family and/or rental housing rehabilitation as well as home modifications for disabled persons.

Goal: Make improvements to five (5) units.

Accomplishments: No CDBG funding has been used for the rehabilitation/modification of any housing units.

Need: Support efforts to expand the supply of assisted rental housing.

Goal: Provide funding to undertake a planning study to determine the potential for affordable housing developments for seniors and special needs populations.

Accomplishments: The Township provided \$11,000 in FY 2014 CDBG funding to H.A.N.D.S to undertake a planning study to determine the need for an affordable housing development for seniors. At the request of HANDS, the activity is to be deleted with future funding to be considered when H.A.N.D.S is nearer to securing a possible site for the development.

NON-HOUSING COMMUNITY DEVELOPMENT NEEDS

Need: Infrastructure - - Sidewalk Accessibility Improvements

Goal: Construct approximately 275 to 300 curb- ramps for handicapped accessibility.

Accomplishments: Beginning with FY 2012 and continuing through and including FY 2014, the township has installed 448 curb ramps utilizing CDBG funds. An additional 140+ ramps will be installed this summer (2016) utilizing FY 2015 CDBG funding. The Township is under a 2011 Consent Decree to install approximately 1,300 curb ramps by 2022.

Need: Infrastructure - -Flood Drain Improvements

Goal: Construct one (1) flood drainage facility.

Accomplishments: There has been no activity regarding this goal and it appears unlikely that the Township will address this need in the foreseeable future.

Need: Infrastructure - - Water/Sewer Improvements

Goal: Replace or extend one (1) water line and or/sanitary sewer line.

Accomplishments: There has been no activity regarding this goal and no areas identified for possible water/sanitary sewer upgrades that would meet the LMI "fundability" criteria. Also, the Township recently sold its water system and its assets to Erie Water Works.

Need: Infrastructure - - Street and Sidewalk Improvements

Goal: Reconstruct one (1) street and replace existing sidewalk.

Accomplishments: There has been no activity regarding this goal. Consideration was being given to using CDBG funds to reconstruct West 20th Street from Lowell Avenue to Evanston Avenue and remove/replace existing sidewalks, however, the area no longer qualifies as LMI as based on the latest HUD 2006-2010 LMI Summary Data.

Need: Public Facilities - - Recreation Improvements

Goal: Improve one (1) park.

Accomplishments: There has been no activity regarding this goal. Consideration is being given to using future CDBG funds to purchase and install playground equipment at Wander Park as well as construct sidewalks around the park.

Need: Public Facilities - - Senior Center

Goal: Assist in the establishment of a new senior center.

Accomplishments: Millcreek Township's new senior center known as the J.O.Y. Center which officially opened its doors to the public on September 17, 2013 has ceased operations and has been shut down.

Need: Public Services - - Senior Services

Goal: Assist the Erie Center on Health and Aging (*dba LifeWorks Erie*) by providing CDBG funding to the Regional Senior Center help offset operating costs.

Accomplishments: FY's 2012, 2014 and 2015 CDBG funds totaling \$48,248 has been provided to the Regional Senior Center to help underwrite expenses related to salaries and benefits of senior center staff directly responsible for programming and service delivery.

Need: Affirmatively Further Fair Housing

Goal: Address impediments to fair housing as identified in the Fair Housing Analysis

Accomplishments: Erie County recently completed a Regional Analysis of Impediments to Fair Housing Choice which it was required to undertake as the recipient of a Sustainable Communities Initiative (SCI) planning grant. The Township passed a Resolution (2015-R-23) on November 10, 2015 approving the Analysis of Impediments to Fair Housing Choice which included a Fair Housing Plan for the township. The next step will be for the Township to begin implementing the recommendations and other activities to "Affirmatively Further Fair Housing".

