

MILLCREEK TOWNSHIP
FY 2017 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
PROGRAM GUIDELINES

Millcreek Township is “entitled” to apply for and receive an annual allocation of CDBG funds from the U.S. Department of Housing and Urban Development (HUD) pursuant to the provisions of Title I of the Housing and Community Development Act of 1974, as amended.

The Township was designated a HUD entitlement in 1998 when its population went over 50,000 persons and since then has received approximately \$5 million in CDBG funds (see Exhibit 1).

CDBG monies are to be used to undertake activities which address community development and/or housing needs as identified in the Township’s Five Year Consolidated Plan (CP) and which principally benefits low-to-moderate income persons.

The Township’s CDBG program is administered by the Erie County Department of Planning (ECDP).

FY 2017 ALLOCATION

The Township’s FY 2017 CDBG allocation is unknown at this time but for the purpose of this application process it is anticipated that the grant will be approximately \$230,000.

HUD allows up to 20% for administration. Approximately 12.5% or \$28,750 of the grant will be set aside for general program administration which as noted above will be provided by the ECDP.

Additionally, approximately 7.5% or \$17,250 of the allocation will need to be set aside to hire a consultant later this year to prepare a new Five Year Consolidated Plan (CP) for Fiscal Years 2018 – 2022 and an Action Plan for FY 2018. *Given this scenario, there would be approximately \$184,000 available for projects.*

ELIGIBLE APPLICANTS

Agencies, groups and organizations which assist residents of Millcreek can apply for a share of the grant dollars.

APPLICATION DEADLINE

The deadline to submit an application for funding consideration is Friday, March 10, 2017. An original and one (1) copy of the application should be forwarded to:

Erie County Department of Planning
150 East Front Street, Suite 300
Erie, Pennsylvania 16507
Attn: Joseph T. Berdis

GENERAL REQUIREMENTS

To qualify for funding consideration an applicant needs to show that its project is: (1) an Eligible Activity; (2) meets a National Objective of the program; and (3) addresses a Community Need as identified in the Five Year Plan.

Eligible Activities

CDBG funds can be used to undertake a wide array of activities (see Exhibit 2) which include, but are not limited to:

- water, sanitary sewer, and storm sewer construction
- street rehabilitation/reconstruction
- sidewalk and curb replacement including removal/replacement of curb-cut ramps
- park/recreation improvements
- removal of architectural barriers to provide handicapped accessibility
- housing rehabilitation
- homeownership assistance
- fair housing activities
- public services (*not to exceed 15% of the grant allocation*)
- program administration (*not to exceed 20% of the grant allocation*).

National Objectives

Each “Eligible” activity must meet one (1) of the following three (3) “National Objectives”:

- Principally benefit low-to-moderate income persons.
- Aid in the prevention or elimination of slums or 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**. It is very rare to qualify a project under Slums or Blight or Urgent Need.

A **LMI person** is an individual whose income is no more than 80% of median income for the area as determined by HUD, based on a four-person family and adjusted upward or downward for larger or smaller families (see Exhibit 3 for current income limits).

The criteria for how an activity may be considered to benefit Low-to-Moderate Income persons can generally be categorized as follows:

- (a) **Low Mod Area Benefit (LMA)** – An “area benefit” activity is one that benefits all residents in a particular area, where at least 51% (*) of the residents are LMI persons.

The area benefit category is the most commonly used national objective for activities that benefit a residential neighborhood. Typical area benefit activities include street rehabilitation; water and sewer line replacement; and curb/sidewalk replacement.

* HUD permits an exception to the LMI area benefit requirement that an area contain at least 51% LMI residents. This exception applies to entitlement communities that have few, if any, areas within their jurisdiction that have 51% or more LMI residents. These communities are allowed to use a percentage less than 51% to qualify activities under the LMI Benefit category. This exception is referred to as the “exception criteria” or the “upper quartile”.

Millcreek Township meets this “exception criteria”. HUD currently allows Millcreek Township to use 37.18% as the minimum LMI percentage to qualify projects on an area basis.

Concentrations of LMI persons can be determined in one of two ways- HUD Census Data and Income Surveys. **Exhibit 4 (including Map)** identifies the number and percentage of LMI persons in each of the Township’s census tracts and block groups.

If the service/benefit area of a project coincides with a block group or census tract that is = to or > 37.18%, the project would qualify as meeting the LMI national objective and can be funded with CDBG monies.

In those cases where a project’s benefit area is smaller in scope and/or does not coincide with a census area that is = to or > 37.1%, then an income survey would need to be undertaken of the residents who would benefit from the proposed project to determine if the LMI National Objective is met. County Planning must be contacted for assistance in undertaking a survey.

(b) Low Mod Limited Clientele (LMC) – The “limited clientele” category is a second way to qualify specific activities under the LMI National Objective. LMC generally refers to a clientele who are *presumed by HUD to be principally low-to-moderate income persons*. This presumption covers abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS and migrant farm workers. Activities that would be expected to qualify under the LMI Limited Clientele category include: installation of ADA curb-cut ramps; construction of a senior center; and public services for the homeless and elderly.

(c) Low Mod Housing Activities (LMH) - The “Housing” category of LMI National Objective qualifies activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. The most common LMH activity is single family housing rehabilitation.

Community Need

As a HUD entitlement community, the Township is required to develop a Five Year Consolidated Plan (CP) which identifies the municipality’s housing, community development, and economic development needs along with a strategic plan on how to address these needs.

The Township's most current plan was completed in 2013 and covers Fiscal Years 2013, 2014, 2015, 2016 and 2017. In submitting an application for FY 2017 funding consideration, the applicant should make sure the proposed project addresses a need/objective as identified in the strategic plan, a summary of which is provided as **Exhibit 5**.

SELECTION OF PROJECTS

Funding requests will be reviewed by County Planning for program acceptability and then forwarded to the Township Supervisors who will select the projects to be funded. It is anticipated that the Township will make its decision by the end of March 2017.

A draft Action Plan which provides the public with information on the projects proposed for funding will be available for a 30 day review period followed by a Final Public Hearing.

The ECDP on behalf of the Township will submit the FY 2017 application to HUD by May 17, 2017.

TENTATIVE SCHEDULE

Friday, February 3, 2017	Applications forwarded by e-mail to agencies/organizations
Sunday, February 5, 2017	Notice published in Erie Times News announcing date/time of First Public Hearing
Thursday, February 16, 2017	First Public Hearing
Friday, March 10, 2017	Applications due into ECDP for funding consideration. The ECDP forwards the applications to the Township.
By Wednesday, March 22, 2017	Supervisors decide which projects they would like to see funded.
Monday, March 27, 2017	Notice published in Erie Times News announcing public review /comment period of Draft Action Plan and date/time of Final Public Hearing.
March 29 –April 28, 2017	30 day display/comment period of Draft Action Plan
Week of May 1, 2017	Final Public Hearing
May 9, 2017	Supervisors pass resolution approving application
Wednesday, May 17, 2017	ECDP submits FY 2017 application to HUD for review and approval.
July 1, 2017	Program start date.

EXHIBIT 1

MILLCREEK TOWNSHIP HUD CDBG PROGRAM ALLOCATIONS

(FY 1998 through FY 2016)

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%
2016	\$234,020	(+) 18,145	+8.41%
TOTAL	\$5,039,951		

EXHIBIT 2

CDBG ELIGIBLE ACTIVITY CATEGORIES

1. **Acquisition of Real Property** –Acquire real property in whole or in part by purchase, long-term lease, donation, etc.
2. **Disposition** –Pay for costs incidental to disposing of real property acquired with CDBG funds. Disposition costs include fees paid for: appraisals, surveys, marketing, legal services, financial services, transfer taxes, and other costs involved in the transfer of ownership of property.
3. **Public Facilities and Improvements** –Acquisition, construction, reconstruction, rehabilitation or installation of public improvements or facilities (except for buildings for the general conduct of government). Public facilities and improvements include, but are not limited to: water, sanitary sewer, and storm sewer facilities; parking areas; sidewalks and curbs; parks and playgrounds; senior citizen centers.
4. **Privately Owned Utilities** –Acquire, reconstruct, rehabilitate, or install distribution lines and facilities of privately owned utilities.
5. **Clearance** –Clearance, demolition, removal of buildings and improvements, and movement of structures to other sites.
6. **Public Services** - Provide public services (including labor, supplies and materials) with the public service being either a new service or a quantifiable increase in the level of a service. Public services include, but are not limited to: childcare, job training, public safety services, fair housing activities, etc.
7. **Interim Assistance** –Make limited improvements to a deteriorating area as a prelude to permanent improvements and also to alleviate an emergency condition which threatens the public's health and safety.
8. **Relocation** –Relocation payments and assistance to displaced persons where required under Section 570.606 of HUD's regulations.
9. **Loss of Rental Income** –Pay housing owners for losses of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by CDBG – assisted activities.
10. **Removal of Architectural Barriers** –Remove material and architectural barriers which restrict the ability and accessibility of elderly and handicapped persons to publicly or privately-owned buildings and facilities. Architectural barrier removal includes the installation of ramps, curb cuts, wider doorways, elevators, and physical modifications to buildings, facilities and improvements to make them accessible.
11. **Housing Rehabilitation** –Finance the rehabilitation of any publicly or privately owned residential property, including the conversion of non-residential property for housing.
12. **New Housing Construction** –Finance or subsidize the construction of new permanent residential structures if the funds are used by the following: Local Development Company; Small Business Investment Company; or Neighborhood-based nonprofit organization, for the construction of housing which the grantee has determined is necessary or appropriate to achieve its community development activities.
13. **Code Enforcement** –Payment of salaries and overhead costs directly related to the enforcement of local codes. CDBG funds may be used for code enforcement only in deteriorating or deteriorated areas where such enforcement, together with public improvements, rehabilitation and services to be provided may be expected to arrest the decline of the area.
14. **Historic Preservation** –Rehabilitate, preserve, and restore publicly or privately owned historic properties.
15. **Commercial or Industrial Rehabilitation** –Finance the rehabilitation of commercial or industrial buildings.
16. **Planning and Capacity Building** –Pay for studies, analyses, data gathering, preparation of plans and the identification of actions that will implement plans. The types of plans which may be paid for with CDBG funds include, but are not limited to: comprehensive plans; community development plans; capital improvement programs; functional plans (such as plans for housing, land use, energy conservation), etc.
17. **Program Administration Costs** –Pay reasonable program administration costs and carrying charges related to the planning and execution of community development activities assisted in whole or in part with funds provided under the CDBG or Urban Development Action Grants program

EXHIBIT 3

**LOW-TO-MODERATE INCOME LIMITS
ERIE COUNTY**

(Effective March 2016)

1 Person	\$32,450
2 Persons	\$37,050
3 Persons	\$41,700
4 persons	\$46,300
5 Persons	\$50,050
6 Persons	\$53,750
7 Persons	\$57,450
8 + Persons	\$61,150

- ❑ A **Low- to-Moderate Income person (LMI)** is an individual whose income is no more than 80% of median income for the area. 80% of median income is determined by HUD based on a four-person family and is adjusted upward or downward for larger or smaller families.

- ❑ **Median Family Income (MFI)** is an annual income figure. Unlike per capita income, which is an average, the median income divides income distribution into two equal parts: one-half below the median income and one-half above. For example, consider five families with incomes of \$10,500, \$20,100, \$31,000, \$40,800 and \$50,000. For family average income, add the five incomes (\$152,400) and divide by the number of families (5). The result is the average of all family incomes considered or a per-family income of \$30,480. The median income for these families would be \$31,000, as there are an equal number of income persons below and above \$31,000. MFI is based on the distribution of the total number of families, including those with no income.

- ❑ **The median family income for a family of four (4) in Erie County is \$57,900.**

EXHIBIT 4 - MILLCREEK TOWNSHIP LOW/MODERATE INCOME SUMMARY DATA

(A Census Tract or Block Group = to or > 37.18% LMI may qualify for CDBG funding)

Census Tract/ Block Group	Total Persons / Low-Mod Universe*	Total Persons / LMI	Percent of LMI Persons
CT 104.00	5,225	1,490	28.52%
BG 1	1,430	650	45.45%
BG 2	1,950	375	19.23%
BG 3	1,845	465	25.20%
CT 105.00	4,570	1,620	35.45%
BG 1	1,940	760	39.18%
BG 2	1,850	570	30.81%
BG 3	780	290	37.18%
CT 107.00	4,045	830	20.52%
BG 1	1,485	280	18.86%
BG 2	1,055	235	22.27%
BG 3	1,505	315	20.93%
CT 108.00	3,510	1,190	33.90%
BG 1	1,475	580	39.32%
BG 2	915	210	22.95%
BG 3	1,120	400	35.71%
CT 109.02	4,120	1,075	26.09%
BG 1	980	330	33.67%
BG 2	830	260	31.33%
BG 3	1,625	80	4.92%
BG 4	685	405	59.12%
CT 109.03	6,595	1,360	20.62%
BG 1	1,580	105	6.65%
BG 2	625	55	8.80%
BG 3	2,210	430	19.46%
BG 4	2,180	770	35.32%
CT 109.04	4,750	320	6.74%
BG 1	1,610	160	9.94%
BG 2	1,775	80	4.51%
BG 3	1,365	80	5.86%
CT 110.01	6,450	1,655	25.66%
BG 1	1,840	240	13.04%
BG 2	1,140	155	13.60%
BG 3	1,925	275	14.29%
BG 4	535	200	37.38%
BG 5	1,010	785	77.72%
CT 110.02	3,645	1,465	40.19%
BG 1	1,750	660	37.71%
BG 2	875	230	26.29%
BG 3	1,020	575	56.37%
CT 111.01	4,890	1,210	24.74%
BG 1	2,290	905	39.52%
BG 2	1,640	140	8.54%
BG 3	960	165	17.19%
CT 111.02	3,090	780	25.24%
BG 1	2,125	480	22.59%
BG 2	965	300	31.09%
CT 124.00	1,445	455	31.49%
BG 1	1,445	455	31.49%
TOTALS	52,335	13,450	25.69%

*The *Low/Moderate Income Summary Data (LMISD)* issued by HUD indicates that the Township has a "total low and moderate income universe/population" of 52,335 persons. The Total Low/Mod Universe is not necessarily the total population as based on the U.S. 2010 Census, but the maximum number of persons that have the potential of being classified as low/mod using 2006-2010 ACS data. HUD's formula for calculating low-moderate income persons excludes persons residing in group quarters. The group quarter population includes persons under formally authorized supervised care or custody such as correctional institutions, nursing homes and juvenile institutions. It also includes non-institutionalized persons living in group quarters such as college dormitories, military quarters, and group home

MAP INSERT



Five Year Strategic Plan Summary

Millcreek Township, Pennsylvania prepared a 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 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 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 handicapped persons.

Goal: Make improvements to five (5) units.

Accomplishments: No homes have been rehabilitated / modified.

Accomplishments/Other- Public Housing Improvements: FY 2015 CDBG funds in the amount of \$3,200 provided for the installation of an automatic door operator on the main interior entrance door of the Gerald S. Salsbury Building which is a three-story elderly housing complex owned and managed by the Erie County Housing Authority.

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 allocated \$10,095 in FY 2013 CDBG funds for H.A.N.D.S to undertake a planning study the information from which would be used to complete a Low Income Housing Tax Credit (LIHTC) application through the PA Housing Finance Agency (PHFA) for two (2) affordable housing developments – one for senior citizens and the other for special needs populations. The project was deleted as it became apparent that the funding was inadequate to undertake a study of such magnitude. The grant monies were subsequently transferred to the Phase II Sidewalk Accessibility Project

The Township allocated \$11,000 in FY 2014 CDBG funds for H.A.N.D.S to undertake the same effort as noted above, with the exception that the study would just focus on a senior development. The project was deleted as H.A.N.D.S was unable to acquire a site/building. The grant monies were subsequently reprogrammed to supplement the FY 2015 CDBG funded Phase IV Sidewalk Accessibility Project.

A vacant County building in Millcreek Township looks promising as a site for development. Given this opportunity and the continued need for affordable rental housing units, the Township most recently allocated FY 2016 funds in the amount of \$11,000 for H.A.N.D.S to once again undertake the planning study which is expected to be completed by June 30, 2017.

NON-HOUSING COMMUNITY DEVELOPMENT NEEDS

Need: Infrastructure - - Sidewalk Accessibility Improvements

Goal: Construct curb-ramps for handicapped accessibility. The Township is under a 2011 Consent Decree to install approximately 1,300 curb ramps by 2022.

Accomplishments:

- One hundred forty-eight (148) ramps were installed in the summer of 2014 utilizing \$151,663.69 in FY 2013 CDBG funds.
- One hundred fifty-four (154) ramps were installed in the summer of 2015 utilizing \$29,818.31 in residual FY 2013 monies and \$157,173 in FY 2014 funds.
- One hundred seventy (170 ramps) were installed in the summer of 2016 utilizing \$171,675 in FY 2015 funds plus \$11,000 in FY 2014 reprogrammed monies from a deleted project.
- Approximately one hundred fifty (150) ramps will be installed in the summer of 2017 utilizing \$177,216 in FY 2016 CDBG funding.

Need: Infrastructure - -Flood Drain Improvements

Goal: Construct one (1) flood drainage facility.

Accomplishments: There has been no activity regarding this goal nor will there be during the remainder of the Five Year CP. The Township has not identified /acquired a site for construction of a flood detention basin.

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 nor will there be during the remainder of the Five Year CP. Also, the Township is no longer in the business of providing water service as its water system and assets have been sold to the 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 given to using CDBG funds to make additional road/sidewalk improvements in the Highland Park area as was done with FY 2009, 2010 and 2011 CDBG funds; however, the area no longer meets the requisite 37.1% LMI threshold according to the most current Low/Moderate Income Summary Data (LMISD).

Need: Public Facilities - - Recreation Improvements

Goal: Improve one (1) park.

Accomplishments: There has been no activity regarding this goal. Consideration was given to using CDBG funds to purchase and install playground equipment and construct sidewalks at Wander Park.

Need: Public Facilities - - Senior Center

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

Accomplishments: The Township allocated \$15,000 in FY 2014 CDBG funding to MECCA, the administrative agent of a new senior center in the Township known as the J.O.Y. Center. The funds were to be used to help pay for additional employee hours so that the Center could expand its days of operation from 3 to 5 days a week. The Center ended up ceasing operations and the grant funds were transferred to the multi-year funded Phase III Sidewalk Accessibility Project.

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 2014 and FY 2015 CDBG funds in the amount of \$9,000 and \$10,000 respectively was provided to the Erie Center On Health and Aging to help the Regional Senior Center offset expenses related to salaries and fringe benefits of senior center staff directly responsible for programming and service delivery. Services provided consisted of health screenings, flu/pneumonia vaccinations, podiatry services, and health education workshops. The Township most recently provided \$10,000 in FY 2016 CDBG funding to the ECHA to continue with this effort.

Need: Affirmatively Further Fair Housing

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

Accomplishments: Erie County completed a Regional Analysis of Impediments to Fair Housing Choice in March 2015. The Township approved the A/I, including a Fair Housing Action Plan, by means of a Resolution (2015-R-23) on November 10, 2015.

The Township most recently provided FY 2016 CDBG funds in the amount of \$5,804 to the Erie County Human Relations Commission to hire a qualified, independent consultant to test the rental housing market for possible discrimination.

