

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

