



DRAFT

ANNUAL ACTION PLAN

FY 2024

**Community Development Block Grant
and
HOME Investment Partnership Program
for
Amherst, Cheektowaga, Tonawanda Consortium**

April 1, 2024 - March 31, 2025

Town of Amherst Community Development



Annual Action Plan
2024

1

Executive Summary

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

1. Introduction

The Town of Amherst receives Federal funding allocations annually, commonly referred to as Entitlement Funds, from the U.S. Department of Housing and Urban Development (HUD). HUD funding is provided to the Town as part of two main programs: The Community Development Block Grant (CDBG) Program and the HOME Investment Partnership Program (HOME), the latter of which Amherst receives as part of a 3-Town Consortium with the Towns of Cheektowaga and Tonawanda (A-C-T HOME Consortium). Prior to every Program Year, Amherst develops an Annual Action Plan with public input that dictates the specifics of how these federal funds will be utilized. The Annual Action Plan is a more refined and specific plan that builds off of The Five-Year Consolidated Plan for Amherst, Cheektowaga and Tonawanda. The Five-Year Consolidated Plan establishes overarching priorities based on researched needs of the community and suggests programs, partners and resources for addressing those needs. The Five-Year Consolidated Plan also provides a background on the institutional structure and public policies that are necessary to implement plan priorities successfully. The 2024 Annual Action Plan is the final annual supplemental to The Five-Year Consolidated Plan (2020-2024). A housing needs assessment and market analysis presented in The Five-Year Consolidated Plan Consortium Profile outlines a number of overriding themes or priorities to address critical housing and neighborhood needs. These themes and priorities are included below and the 2024 Action Plan must outline specific programs and projects that address these priorities:

Priority #1:

Maintain and improve housing stock through rehabilitation, demolition and new construction for low-moderate income households.

Rehabilitation of existing low-moderate income owner-occupied housing, including substantial rehabilitation;

Weatherization Assistance Program to assist low income homeowners;

Substantial rehabilitation or demolition of severely deteriorated housing occupied by low income homeowners and construction of new housing;

Priority #2:

Maintain the supply of decent and affordable existing and new rental housing and supportive elderly housing for low and very low income residents.

Provide and increase affordable homeownership opportunities to low income households.

Priority #3:

Provide for emergency shelter and service needs of the homeless.
Address the housing and service needs of the at-risk population and others with special needs.
Prevent or ameliorate neighborhood deterioration in areas where low income households and substandard conditions are concentrated.

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.

The overall goal of the CDBG Program is the development of viable urban communities that will provide decent affordable housing, a suitable living environment and expanded economic opportunities, principally for low- to-moderate income persons. The main focus of the Town of Amherst's program is in the area of housing and neighborhood preservation. The CDBG Program's broad goals can be accomplished by a variety of eligible activities including housing rehabilitation, improvements to public facilities and infrastructure, recreation improvements, community policing, economic development activities and public service programs.

Besides housing, the Town of Amherst also uses CDBG funds to create suitable living environments by funding public services that improve the lives of its low and moderate income residents by providing services to seniors, youth, and at-risk populations, such as victims of domestic violence.

Development of this Annual Plan takes place on an ongoing basis throughout the year, as the Town receives continual input from various parties in the delivery of housing and community development activities. The Town began the process by notifying residents of low income housing developments in the Town of the availability of HOME and CDBG funds at the October 16, 2023 public hearing held during the Amherst Town Board meeting. Mailings soliciting input were provided to Belmont Housing Resources for WNY, Inc., Housing Opportunities Made Equal, the Buffalo Urban League, the YWCA, Inc., the Family Justice Center, Child & Family Services, Legal Aid Bureau of Buffalo, the Village of Williamsville, Supportive Services Corp., Parachute Credit Counseling, Inc., and Western New York Independent Living as well as Town Departments involved with service/activity delivery to residents in at-risk neighborhoods and to special populations. A final public hearing will be held in January 2024 and will notify the public of the final Plan publication and final budget decisions for CDBG and HOME funds.

The three overarching objectives guiding the proposed activities are:

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

Community Development Objectives

Infrastructure

Prevent or reduce deterioration in neighborhoods through installation of new or replacement of deteriorated infrastructure such as sidewalks, curb cuts, sewer improvements, etc.

Public Facilities

The Town has extensive park and recreation systems that need to be maintained and upgraded to have a positive impact on the quality of life of the residents.

Public Services

There are many direct, supportive counseling services needed to improve the quality of life and to help mitigate and prevent problems for youth, senior citizens and families in need of assistance.

Economic Development

There is a need to foster redevelopment in the town's older neighborhood business districts and create/retain jobs for lower-income persons.

Historic Preservation

There is a recognized need to preserve elements of local heritage and accomplish historic preservation within the town and village.

3. Evaluation of past performance

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

Single family owner-occupied home rehabilitation continues to be the main focus of CDBG and HOME programming in the Towns. During the 2022 PY, Amherst provided \$692,714.31 in housing rehab loans to thirty-two (32) single family homeowners. \$363,681 in CDBG funds, \$241,900.19 in HOME funds, and \$87,132.38 in NYS Affordable Housing Corporation's matching grant funds expended during this period. Lead paint hazards were remediated from nine (9) homes and eleven (11) homes were weatherized in Amherst. There has not been much relief from the competitive housing market as interest rates keep rising. No HOME funds were utilized in the 2022 program year to assist individual first-time homebuyers purchasing homes in Amherst.

HOME funds are also used to purchase foreclosed, vacant and deteriorated residences in Amherst for rehabilitation (or demolition/new construction) and eventual resale to an income eligible first-time homebuyer. This activity is accomplished in conjunction with the Town's designated Owner Developer, New Opportunities Community Housing Development Corp. In Program Year 2022, New Opportunities

completed their rehab of a vacant property located at 345 Grover Cleveland Highway and the Town closed on the next project site at 44 Sunset Ct. 345 Grover Cleveland was successfully sold to a first-time homebuyer in Program Year 2023. On the other hand, the new Acquisition/New Construction/Resale project at 44 Sunset Ct was canceled as the cost of the home's construction exponentially increased due to soil conditions. The design fix required engineering configuration and substantial structural materials to develop a sustainable foundation. The cost of this engineered foundation (approximately \$140,000) would ultimately offset a reasonable purchase subsidy, creating a housing equity-burden to any potential buyers. As a result, it was decided that the funds should be reallocated into better cost-benefit programming, such as the First-time Homebuyer Program and the HOME Rental Subsidy..

In Cheektowaga, two single family homes started construction during the 2021 Program Year, one on Peachrow, and one on Gardenvale. These projects were completed and sold to first time homebuyers in Program Year 2023. Cheektowaga has also expended \$300,000 in HOME funds for the Angela's House Project, a low-income 67 unit senior apartment complex to be developed at 600 Doat Street. Their funds will provide for 3 HOME-assisted units over a 30-year term. This project was also completed in Program Year 2023

In Cheektowaga, \$195,590.65 of HOME funds were spent on nine (9) housing rehabilitation activities and one (1) first-time homebuyer closing-cost assistance activity; plus \$254,801.28 of HOME funds were spent on the rehabilitation of one (1) home on Hoerner Avenue. The Hoerner Avenue home was sold to income eligible first-time homebuyers. Six (6) Cheektowaga properties that had lead-based paint were also remediated in 2022. In Tonawanda, \$201,840 of HOME funds were spent in PY 2022 on housing rehabilitation for four (4) single-family homes, of which two(2) had lead paint remediated.

CDBG funds are also applied to many community services, some of which provided increased support to meet heavier COVID demands, such as fair housing/discrimination assistance, housing counseling, community policing, after-school programming and, weatherization, domestic violence support, and senior/disabled support services.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The development of the Annual Action Plan is a public process that invites citizens, including residents of public and assisted housing developments, to comment on the plan via public hearings and written statements. Public participation is sought and managed according to the Towns Citizen Participation Plans. Copies of the Towns Citizen Participation Plans are available upon request.

A Notice of a Public Hearing on the Annual Action Plan is published as a display ad in the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE at least 10 days prior to the date of each of the public hearings held during the planning process. Public hearings in the Town of Amherst are conducted as part

of regularly scheduled Town Board meetings and thus have a "captive audience" with a broader reach than would be experienced at separate meetings for the Annual Action Plan alone. These meetings are also broadcast on local public access television and available through video recordings of the meetings on Amherst's Town website.

In order to afford citizens, public agencies, and other interested parties another reasonable opportunity to examine the plans contents and to submit comments, the Towns also publish a summary of the proposed Annual Action Plan and where the document is available for review in the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE as a display advertisement, at least 30 days prior to submission of the final document to the U.S. Department of Housing and Urban Development (HUD).

Complete copies of the draft and final Annual Action Plan are made available online on the Towns websites, as well as in all Town libraries, the Amherst Planning Department, the Village Clerks offices in Depew, Sloan, Kenmore and Williamsville and the Town Clerks offices in Amherst, Tonawanda and Cheektowaga. In addition, the Towns provide a copy of the Plan to any citizens and/or organizations that request it.

The Towns will consider any comments or views of citizens received in writing, or orally at the public hearings, during the preparation of the final Annual Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Annual Action Plan. At this time the Town provided notice via the above channels that the final deadline for public comments on the 2024 Draft Annual Action Plan is January 16, 2024, and were required to be submitted in writing to Amherst Community Development, 5583 Main Street, Williamsville, NY 14221 or to communitydevelopment@amherst.ny.us.

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.

There were no public comments received during the first public comment period held in October 2023.

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

N/A7. Summary

N/A

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	Amherst	
CDBG Administrator	Amherst	Town of Amherst Community Development
HOPWA Administrator		
HOME Administrator	Amherst	Town of Amherst Community Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The Town of Amherst administers the Town's Community Development Block Grant (CDBG) Grant and is also lead town for the Amherst, Cheektowaga and Tonawanda HOME Investment Partnership (HOME) Consortium. CDBG funds to be awarded by HUD in FY 2024 total \$628,000. If the actual CDBG award being provided by HUD is lower than anticipated, the funding reduction will be applied to the Homeowner Rehab Program and administration costs (if necessary). The ACT HOME Consortium is expecting HOME Grant funds of \$1,000,000 to be shared by the three Towns (Amherst, Cheektowaga and Tonawanda). Any change in estimated HOME funding will be absorbed by the HOME Housing Rehabilitation activities in the Consortium Towns, after the 10% Administration costs are adjusted.

Consolidated Plan Public Contact Information

The Town of Amherst Community Development administers the Amherst HOME Consortium allocation for the three towns of Amherst, Cheektowaga and Tonawanda. Amherst's Community Development Department is also responsible for the Consortium's Five Year Consolidated Plan in collaboration with the Towns of Cheektowaga and Tonawanda. The Town of Amherst is the point of contact for both of these planning documents.

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Town of Amherst is the "Participating Jurisdiction" or Lead Agency, for the ACT HOME Consortium. HOME and CDBG will be administered through the Community Development division of the Town's Planning Department. New Opportunities Community Housing Development Corp. and University CDA are non-profit neighborhood development agencies and will manage the projects involving the acquisition and rehabilitation or new construction of housing.

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(l)).

The Town of Amherst will continue to act as the lead for the Erie County PHA Consortium, acting as a conduit for Section 8 (Housing Choice Voucher Program) rental subsidies for eligible, very low income households in Erie County;

Continue to support eligible development applications for new rental units for low income elderly through the Supportive Housing for the Elderly Program (Section 202);

Continue to support eligible development applications for newly created rental units for low-income disabled residents and support applications for new rental units for low income elderly through the Section 8/Section 202 New Construction Program, and Amherst's HOME Rental Subsidy Program, as funding becomes available.

Housing Opportunities Made Equal (H.O.M.E) will advocate for victims of perceived housing discrimination and offer informational workshops on discrimination to Town Officials. Fair Housing Resources and the generation of Fair Housing News will also be handled by H.O.M.E. and a link to their website is available on the Town's Community Development webpage under Fair Housing.

Buffalo Urban league will advocate for victims of predatory lending practices, refinancing and foreclosure prevention scams, both in cases of existing homeowners attempting to refinance mortgages, and new homebuyers in need of mortgages. Counseling is also available for Town residents with consumer credit issues and the League may arrange free legal services for the low-income families and elderly households facing mortgage foreclosure or other legal/credit issues.

Belmont Housing Resources for WNY, Inc. will administer housing counseling and financial education services for recipients of first-time homebuyer assistance under the HOME program, for households in danger of mortgage default; at-risk households in danger of becoming homeless; and tenant-landlord disputes. Consultation on reverse mortgages is also available for eligible senior homeowners.

Erie County Supportive Services Corp. will administer weatherization services for low-income owner and tenant households (excluding multi-unit complexes) providing energy efficient heating and insulation, windows and weatherproofing and in some cases energy efficient refrigerators.

The Town will continue to work with the sub-recipient agencies that currently assist in program delivery. Amherst will also continue to cultivate relationships with other agencies that provide housing and service delivery to residents in at-risk neighborhoods and to special populations. Finally, the Town will continue to solicit input from agencies to provide new venues for providing affordable housing, assisting such agencies in locating appropriate sites for new investment and redevelopment.

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 Town of Amherst and the ACT HOME Consortium work with the Homeless Alliance of Western New York, our Continuum of Care for the homeless and at risk population of the area, to identify and meet the needs of this population and work to provide shelter and affordable, stable housing to prevent homelessness. Amherst does not receive any ESG funding and any monetary assistance is through CDBG.

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

N/A

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Belmont Housing Resources for WNY, Inc.
	Agency/Group/Organization Type	Housing PHA Services-homeless Service-Fair Housing Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Belmont Housing Resources for WNY, Inc. administers the Housing Choice Voucher Program (HCV) (formerly known as Section 8 Program) for Western New York. Their current waiting list has been suspended since July 2011 and is currently closed to new applicants until current applicants are accommodated. The Town of Amherst, as lead agency for the Erie County PHA Consortium, oversees the monitoring of Belmont's Section 8 Program
2	Agency/Group/Organization	Buffalo Urban League Inc.
	Agency/Group/Organization Type	Services - Housing Services-Education Services-Employment Service-Fair Housing Regional organization Foundation

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Buffalo Urban League, Inc. (BUL) will advocate for victims of predatory lending practices, refinancing and foreclosure prevention scams, both in cases of existing homeowners attempting to refinance mortgages and new homebuyers in need of mortgages. Counseling is also available for Town residents with consumer credit issues and BUL with the Western New York Law Center may arrange free legal services for the low-income families and elderly households facing mortgage foreclosure or credit issues.
3	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Education Service-Fair Housing Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Opportunities Made Equal, Inc. (HOME) will advocate for victims of perceived housing discrimination and offer informational workshops on discrimination to Town Officials. Advertising for Fair Housing issues will also be handled by HOME and a link to their website is on the Town's Community Development page: www.amherst.ny.us/community (under Fair Housing). A landlord-tenant training and fair housing video are typically scheduled in the Town as a Fair Housing Month activity.

4	Agency/Group/Organization	Child and Family Services of Erie County (Haven House)
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Child and Family Services of Erie County operates Haven House, a licensed Non-Residential Domestic Violence Program. Child and Family Services directly supports domestic violence victims and their families by having a Domestic Violence Advocate co-located within the Town of Amherst Police Department and Town Courts acting as a liaison as necessary as well as providing safety planning, supportive counseling, referrals to community resources, economic supports, and supports for children. The advocate also assists victims of domestic violence with completing applications to the Office of Victim Services (OVS) which provides monetary relief.

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

N/A

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	Homeless Alliance of WNY	Homeless Alliance of WNY is the designated Continuum of Care (CoC) agency for Erie County. The Consortium supports the efforts of the Homeless Alliance of WNY as the Collaborative Applicant of the Continuum of Care. Although homelessness is not perceived as a significant problem in the A-C-T Consortium, persons who are homeless or at-risk have access to the various elements of the CoC available. Amherst works with County and Town agencies and the CoC to assist and provide services to Town residents.

Table 3 – Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 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**

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	Non-targeted/broad community	First Public Hearing at Town Board meeting on October 16, 2023. Second Public Hearing will be held at the second Town Board meeting in January 2024.	New public requests for funding were received. See section AP-05	Comments were considered but other Town funding is available (non-CDBG).	

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	Non-targeted/broad community	Display Ad in Amherst Bee for notice of first public hearing and public meeting in October 2023; ad in Amherst Bee for notice of availability of draft Annual Action Plan available for review in December 2023.	None received	N/A	www.amherstbee.com
3	Public Meeting	Non-targeted/broad community	Notices for public hearings, availability of requests for funding, overall budget, Draft Annual Plan, and proposed projects are posted on the main page of the Town's website.	None received	N/A	www.amherst.ny.us

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The Town of Amherst will receive \$628,000 in Community Development Block Grant funding for 2024, with roughly \$110,000 in program income received during the program year. The Amherst, Cheektowaga, Tonawanda (A-C-T) HOME Consortium will receive \$1,000,000 in 2024 HOME Investment Partnerships Grant funding, with an anticipated \$400,000 in program income. The Town of Amherst also has another \$300,000 in the New York State Affordable Housing Grant to match and supplement the CDBG and HOME funding allocated to its housing rehabilitation program. Any increases in CDBG funds for Amherst will be allocated to the Homeowner Rehab Program while decreases will be absorbed in the Homeowner Rehab Program. Any increases or decreases in the HOME funding in the allocations from HUD will be applied to the Homeowner Rehabilitation Programs for the Consortium.

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	628,000	110,000	0	738,000	0	

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,000,000	400,000	0	1,400,000	0	
Other	public - federal	Other	0	0	0	0	0	

Table 2 - 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 Town of Amherst has received a \$300,000 New York State Affordable Housing Corporation Grant in 2021 that offers eligible single family homeowners a forgivable grant amount toward the rehabilitation of their home. The grant matches the Town's CDBG or HOME rehabilitation funds 60/40. The CDBG or HOME portion of the assistance is offered as a 0% deferred loan, to be repaid at sale or transfer of the property, or if the homeowner no longer permanently resides in the home. It typically takes three years for Amherst to utilize all of the NYS grant funds.

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

N/A

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Housing Stock	2020	2024	Affordable Housing	Eggertsville Town Wide	Residential Rehabilitation- Owner-Occupied Residential Rehab- Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab- Owner Occupied Rental Acquisition Rehabilitation/New Construction Resale	CDBG: \$274,040 HOME: \$300,000	Rental units rehabilitated: (3)?1 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Promote Affordable Homeownership	2020	2024	Affordable Housing	Eggertsville Town Wide	Acquisition Rehabilitation/New Construction Resale Homebuyer Assistance for Affordable Housing	HOME: \$170,090	Homeowner Housing Added: 1 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Assistance to At-Risk Pop/Reduce Homelessness Risk	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs	Town Wide	Assist Victims of Domestic Violence Housing Counseling & Foreclosure Prevention Assist	CDBG: \$20,000	Homelessness Prevention: 150 Persons Assisted
4	Weatherization Assistance	2020	2024	Affordable Housing	Town Wide	Weatherization Assistance	CDBG: \$10,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
5	Affirmatively Further Fair Housing	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 175 Persons Assisted
6	Historic Preservation/Elimination of Slum & Blight	2020	2024	Preservation	Town Wide	Historic Preservation	CDBG: \$43,960	Exterior Building preservation rehab: 2 public buildings
7	Community Services	2020	2024	Non-Housing Community Development	Town Wide	Public Services	CDBG: \$40,000	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Egbertsville Opportunity Zone - Census Tract 92	Neighborhood Beautification and Infrastructure	CDBG: \$82,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Improve Housing Stock
	Goal Description	<p>Amherst will utilize CDBG resources to improve and maintain quality affordable housing stock through funding for maintenance and rehabilitation of (i) existing owner-occupied low-income rental housing, (ii) existing renter-occupied low-income housing, (iii) Military Veteran household units, (iv) and households in need of improvements for handicapped accessibility.</p> <p>Conduct homeowner rehabilitation for ten extremely low-income, fifteen low-income, nine moderate-income, and three Military Veteran households through the Towns' Housing Rehabilitation Program. The programs improve and maintain quality affordable housing stock within the Towns of Amherst, Cheektowaga and Tonawanda, including those with lead-paint issues.</p> <p>CDBG: Amherst \$274,040 (plus \$100,000 Program Income) HOME: Amherst \$0 (ample prior year funding); Tonawanda \$280,000 (\$90,000 in Program Income); Cheektowaga \$300,000 (\$180,000 Program Income)</p> <p>Previous years funding will supplement the HOME EN funding for the Residential Rehab Programs. Improvements for handicapped accessibility are offered through the Towns' Homeowner Rehab Programs. Approximately five units will be assisted for senior's aging-in-place or homeowners with physical challenges.</p> <p>Amherst will also provide a HOME Rental Subsidy Program to provide a long-term deferred 0% loan towards the construction of new affordable rental housing developments with priorities for serving LMI seniors, disabled, special populations. The program will generate approximately 2 HOME subsidized units, assisting 2 households.</p> <p>HOME: Amherst \$300,000 EN funds are allocated.</p>

2	Goal Name	Promote Affordable Homeownership
	Goal Description	<p>Promote Home Ownership for Low-/Moderate Income Households by providing the following: purchase assistance through the Towns' First-time Home Buyer Programs; and creation of new affordable housing through the Consortium's Acquisition/Rehab or New Construction/Resale Program. Through the HOME Investment Partnership Program affordable homeownership opportunities will be made available to persons with incomes below 80% median income in the Towns of Cheektowaga, Amherst and Tonawanda. The First-time Homebuyer Program will provides closing cost assistance (0% loans) to approximately six income qualifying individuals.</p> <p>HOME: Amherst - Assist 4 homebuyers; (ample prior year funding). HOME: Tonawanda – Assist 2 homebuyers; \$20,000 allocated.</p> <p>The Acquisition-Rehabilitation/New Construction-Resale program will help to expand the supply of decent, safe and affordable housing to low and moderate income households and will promote economic self-sufficiency for lower income families and individuals who are first-time homebuyers. The Consortium will assist two households with this opportunity in 2022.</p> <p>The HOME funding for the Acquisition-Rehab/New Construction-Resale Program is allocated accordingly:</p> <p>CDBG Acquisition: Amherst - \$0; (ample prior year funding). HOME: Amherst - \$0, (ample prior year funding), prior years program income will also be applied. HOME: Cheektowaga - \$300,000, prior years' program income will also be applied.</p>

3	Goal Name	Assistance to At-Risk Pop/Reduce Homelessness Risk
	Goal Description	<p>Provide assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless. Amherst’s CDBG funding will be utilized to provide public services through the Child and Family Services of Erie County (Haven House), Belmont Housing Resources for WNY, and Buffalo Urban League to prevent homelessness of certain at-risk populations.</p> <p>Child and Family Services of Erie County works with victims of domestic violence and operates Haven House, a licensed Domestic Violence residency Program. In Amherst, a Domestic Violence Advocate is co-located in the Amherst Town Court and Police Department to directly and immediately assist victims with necessary support and act as a liaison.</p> <p>Buffalo Urban League provides housing counseling services to ensure families find and maintain affordable housing options that work for them. Counseling includes foreclosure prevention; first-time homebuyer education; financial management counseling; rental-assistance counseling; and fair housing counseling.</p> <p>Belmont Housing Resources for WNY provides a variety of counseling services to assist first-time homebuyers; help persons with credit problems to qualify for FHA insured mortgages; help persons save their homes from foreclosure with financial counseling and intervention with mortgagors; assist renters in resolving disputes with landlords; all of which assist in preventing homelessness.</p> <p>Amherst will utilize CDBG funding to provide this assistance and aims to assist 200 households.</p> <p>CDBG: Amherst - \$8,000 Buffalo Urban League CDBG: Amherst - \$20,000 Child and Family Services of Erie County (Haven House) CDBG: Amherst - \$16,500 Belmont Housing Resources for WNY</p>

4	Goal Name	Weatherization Assistance
	Goal Description	<p>Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable housing. This program will create more energy efficient housing units for low-moderate income homeowners by providing energy audits resulting in as-needed energy efficient furnaces, insulation, windows and, in some cases, energy efficient refrigerators. The energy savings will assist in creating a more affordable housing environment throughout the Consortium. Through CDBG funding, the Town covers the materials needed.</p> <p>CDBG: Amherst – 15 units assisted, \$10,000 allocated</p>
5	Goal Name	Affirmatively Further Fair Housing
	Goal Description	<p>Ensure access to fair, safe and affordable housing for all residents and strive to prevent discrimination in housing and the workplace. Amherst, through CDBG funding, provides fair housing counseling services via Housing Opportunities Made Equal. Housing Opportunities Made Equal provides education and enforcement action for fair housing and landlord tenant disputes and reports perceived discrimination in housing and employment.</p> <p>CDBG: Amherst - \$10,000 Allocated</p>
6	Goal Name	Historic Preservation/Elimination of Slum & Blight
	Goal Description	<p>Address buildings and public facilities in need of repair in order to eliminate neighborhood slum and blight. The Village of Williamsville is specifically looking at the Village Meeting House and the Williamsville Section House on the former Rail Yard south of Main Street in the Village as in need of stabilization and preservation services. They will allocate a portion of their 2023 share (7%) of CDBG funding to stabilize this Historic Landmark structure.</p> <p>CDBG: Williamsville - \$43,960 allocated.</p>
7	Goal Name	Community Services
	Goal Description	<p>Improve the quality of life for seniors in the community by providing free and reduced nutritious meals through the Meals on Wheels Program. The Town of Amherst will continue to fund an additional FT cook to meet the increased demand for meals within the program. The program is expected to benefit approximately 400 seniors in 2024.</p> <p>CDBG: Amherst - \$42,500 allocated to Meals on Wheels.</p>

8	Goal Name	Public Facilities and Infrastructure
	Goal Description	<p>CDBG Public Infrastructure will focus on necessary improvements, such as sewer work and sidewalk replacement or the development of new playgrounds needed in eligible LMI target areas of the Town.</p> <p>CDBG: Amherst - \$82,000 EN</p>

AP-35 Projects - 91.420, 91.220(d)

Introduction

The proposed projects for the estimated allocation of 2024 CDBG and HOME funds have been determined through citizen participation, community outreach, Town departments, neighborhood organizations' and non-profit agencies' requests for funding based upon the goals and objectives of the 2020-2024 Consolidated Plan.

#	Project Name
1	Amherst CDBG Housing Rehabilitation
2	CDBG Administration
3	CDBG Public Information
4	Weatherization Program for Single Family Homes
5	Belmont Housing Counseling Services
6	Buffalo Urban League Foreclosure Prevention Services
7	Fair Housing Counseling through Housing Opportunities Made Equal
8	Child & Family Services for Erie County-Domestic Violence
9	Village of Williamsville Public Facilities and Historic Preservation
10	Meals on Wheels at the Senior Center
11	Public Facilities and Infrastructure in LMI areas
12	Amherst HOME Housing Rehabilitation
13	Amherst First-Time Homebuyer Program
14	Amherst HOME Administration
15	Amherst HOME Rental Subsidy
16	Cheektowaga HOME Housing Rehabilitation
17	Cheektowaga HOME Administration
18	Tonawanda Residential Rehabilitation Program
19	Tonawanda First-Time Homebuyer Program
20	Tonawanda HOME Administration
21	Administration Costs for the 5 Year Consolidated Plan
22	Amherst HOME Acquisition/Rehabilitation/New Construction/Resale

Table 4 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	Amherst CDBG Housing Rehabilitation
	Target Area	
	Goals Supported	
	Needs Addressed	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	Funding	CDBG: \$284,040
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. \$163,240 CDBG Rehab (EN), \$10,000 for military grants, plus \$100,000 anticipated CDBG Program Income received FY'23 to supplement entitlement funds. There is 110,800 for CDBG payroll. CDBG housing rehab for 2024 will be accomplished with entitlement funds and program income.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	25 Households will be assisted.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 14A Approximately 25 households will be assisted.
2	Project Name	CDBG Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$108,000
	Description	These funds will be used for the staff administration of the CDBG grant.
	Target Date	3/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21A Administration of all CDBG funded activities.
3	Project Name	CDBG Public Information
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$3,000
	Description	Advertising for Public Hearings, the availability of funds, reports, plans, and other housing activities or opportunities associated with the federal grants received by the Town.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21C Advertising for Public Hearings, the availability of funds, reports, plans, and other housing activities or opportunities associated with the federal grants received by the Town.
4	Project Name	Weatherization Program for Single Family Homes
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$10,000

	Description	Create more energy efficient housing units for low-moderate income homeowners by providing energy audits resulting in as-needed energy efficient furnaces, insulation and in some cases windows and energy efficient refrigerators. The energy savings will assist in creating a more affordable housing environment throughout the Consortium.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 16 housing units weatherized.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 14F Housing rehabilitation with the sole purpose of improving energy efficiency.
5	Project Name	Belmont Housing Counseling Services
	Target Area	
	Goals Supported	
	Needs Addressed	Housing Counseling & Foreclosure Prevention Assistance
	Funding	CDBG: \$16,500
	Description	Belmont Housing Resources for WNY, Inc. is a HUD certified counseling agency that will provide tenant, pre-purchase, post-purchase, foreclosure, reverse mortgage and mortgage default counseling services to low-moderate income residents. \$16,500 in entitlement will fund this Activity.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 households assisted.
	Location Description	Townwide

	Planned Activities	HUD Matrix Code: 05U Counselors from Belmont Housing Resources for WNY, Inc. (Belmont) will offer financial education classes and individual financial and landlord/tenant counseling to first time homebuyers two times per month in Amherst Town Hall as well as at the Main Street (Buffalo) offices of Belmont. These counseling services include credit counseling, reverse mortgage information, mortgage default and foreclosure prevention and landlord-tenant rights information as well as first time homebuyer assistance.
6	Project Name	Buffalo Urban League Foreclosure Prevention Services
	Target Area	
	Goals Supported	
	Needs Addressed	Housing Counseling & Foreclosure Prevention Assistance
	Funding	CDBG: \$8,000
	Description	Buffalo Urban League provides counseling on mortgage modification and foreclosure prevention, and provides the legal services needed to assist homeowners to remain in their homes through the loan modification process.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will be assisted.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 05C Buffalo Urban League provides counseling on mortgage modification and foreclosure prevention, and provides the legal services needed to assist homeowners to remain in their homes through the loan modification process.
7	Project Name	Fair Housing Counseling through Housing Opportunities Made Equal
	Target Area	
	Goals Supported	
	Needs Addressed	Fair Housing Counseling
	Funding	CDBG: \$10,000

	Description	Housing Opportunities Made Equal, Inc. (HOME) will advocate for victims of perceived housing discrimination and offer informational workshops on discrimination to Town Officials. Advertising for Fair Housing issues will also be handled by HOME and a link to their website is on the Town's Community Development page: www.amherst.ny.us/community (under Fair Housing). A landlord-tenant training and fair housing video are typically scheduled in the Town as a Fair Housing Month activity.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 households will be assisted.
	Location Description	Town wide
	Planned Activities	HUD Matrix Code 21D The counselors and legal staff of Housing Opportunities Made Equal offer services to current and potential residents of the Town who feel they are victims of discrimination in housing and employment. The staff also provides information about landlord and tenant rights and mitigation in rental disputes if needed. HOME provides the enforcement of the Fair Housing Act to ensure that all persons are treated equally in their desire for affordable safe and secure housing in Amherst.
8	Project Name	Child & Family Services for Erie County-Domestic Violence
	Target Area	
	Goals Supported	
	Needs Addressed	Assist Victims of Domestic Violence
	Funding	CDBG: \$20,000
	Description	Child & Family services runs the Haven House and has an advocate that works with the Town of Amherst Police Department and the Town Courts. This advocate supports and assists victims of domestic violence in Amherst. The funding would go towards a portion of their salary.
	Target Date	3/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 households would be assisted.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 05G This advocate supports and assists victims of domestic violence in Amherst. The funding would go towards a portion of their salary.
9	Project Name	Village of Williamsville Public Facilities and Historic Preservation
	Target Area	
	Goals Supported	
	Needs Addressed	Historic Preservation
	Funding	CDBG: \$43,960
	Description	The Village of Williamsville is allocated 7% of Amherst's annual CDBG funding. Funding will be directed to historic preservation work on the Historic Village Meeting House, or other public facilities within the Village. The Village has decided to commit their CDBG allocation to this activity. Any increase or decrease in CDBG funding will be reflected in this share of CDBG funding.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	One facility assisted.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 16B The Historic Meeting House project will cover the exterior repairs and new doors.
10	Project Name	Meals on Wheels at the Senior Center
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services

	Funding	CDBG: \$42,500
	Description	The Amherst Senior Center will utilize \$42,500 towards the payroll of an additional full time cook for the Meals on Wheels program which provides nutrition services to senior citizens.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	400 person assisted.
	Location Description	Townwide
	Planned Activities	Matrix code 5A Senior Services
11	Project Name	Public Facilities and Infrastructure in LMI areas
	Target Area	
	Goals Supported	
	Needs Addressed	Public Facilities
	Funding	CDBG: \$82,000
	Description	The funding will be utilized at either the Northwest Community Center playground or it will be used for sewer linings in LMI areas of the Town.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 households
	Location Description	LMI areas-townwide
	Planned Activities	Matrix Code 03L – Sidewalks Matrix Code 03J – Water/Sewer Improvements Matrix Code 03F-Playgrounds
	Project Name	Amherst HOME Housing Rehabilitation

12	Target Area	Egbertsville Town Wide Opportunity Zone - Census Tract 92
	Goals Supported	
	Needs Addressed	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	Funding	:
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. Anticipated \$100,000 of HOME Program Income to be received FY24. We have over \$300,000 right now to spend, so no entitlement funds in 2024 will go to this project. The Town's State AHP Grant will supplement the funding in target areas.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	25 households will be assisted.
	Location Description	Townwide
	Planned Activities	HUD Matrix Code 14A Housing rehabilitation for needed repairs to bring properties to code and provide safe secure housing units. These repairs may include structural or mechanical systems such as roofing, siding, insulation, windows, doors, electrical and plumbing.
13	Project Name	Amherst First-Time Homebuyer Program
	Target Area	Egbertsville Town Wide Opportunity Zone - Census Tract 92
	Goals Supported	
	Needs Addressed	Homebuyer Assistance for Affordable Housing
	Funding	:

	Description	Down payment and Closing Cost Assistance up to \$50,000 is provided in the form of a 0% deferred loan to income eligible first time home buyers in the Town and Village of Williamsville. Eligibility is for households less than 80% AMI based upon 2024 HUD Income Guidelines. This activity will be supplemented with HOME program income received from previous closing cost assistance loans. This activity will use funding from the funds that were set aside for 44 Sunset, which was canceled as an activity.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 6 households will be assisted.
	Location Description	Townwide
	Planned Activities	Matrix Code 13 Direct Homeownership assistance to LMI households.
14	Project Name	Amherst HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	HOME: \$100,000
	Description	Funds for staff and office costs for oversight and implementation of HOME activities: \$100,000. This figure is 10% of the expected total HOME Consortium allocation. The admin funding will be supplemented with Amherst HOME \$10,000 of Program Income for a total of \$110,000.00 to utilize towards admin.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code: 21H Oversight and administration of the HOME Investment Partnership Grant for the Amherst HOME Consortium.

15	Project Name	Amherst HOME Rental Subsidy
	Target Area	
	Goals Supported	
	Needs Addressed	New Rental Housing for Special Needs Populations
	Funding	HOME: \$300,000
	Description	The Amherst HOME Rental Subsidy provides a long-term deferred 0% loan towards the construction of new affordable rental housing development serving LMI seniors, disabled, special populations within the Town of Amherst. For 2024, \$300,000 in HOME EN funds are allocated.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	3 HOME assisted units.
	Location Description	Townwide
	Planned Activities	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
16	Project Name	Cheektowaga HOME Housing Rehabilitation
	Target Area	
	Goals Supported	
	Needs Addressed	Residential Rehabilitation-Owner-Occupied Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	Funding	CDBG: \$300,000
	Description	The Town of Cheektowaga will allocate \$180,000 PI and \$300,000 of EN for FY2024 to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) for necessary repairs to their homes.
	Target Date	3/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	10 Households assisted.
	Location Description	Townwide
	Planned Activities	Approximately 10 low and moderate income homeowners will be assisted.
17	Project Name	Cheektowaga HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	The Town of Cheektowaga will use 10% of its HOME program income received in 2024 for admin. funding for staff to administer the HOME program.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
Planned Activities	N/A	
18	Project Name	Tonawanda Residential Rehabilitation Program
	Target Area	
	Goals Supported	
	Needs Addressed	Residential Rehabilitation-Owner-Occupied Handicapped Accessibility
	Funding	HOME: \$280,000

	Description	The Town of Tonawanda will allocate \$280,000 of FY2024 HOME EN and approximately \$90,000 of Program Income for a total of \$370,000 to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) in the Town-excluding the Village of Kenmore-for necessary repairs to their homes.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	6 households will be assisted.
	Location Description	Townwide
	Planned Activities	
19	Project Name	Tonawanda First-Time Homebuyer Program
	Target Area	
	Goals Supported	
	Needs Addressed	Homebuyer Assistance for Affordable Housing
	Funding	HOME: \$20,000
	Description	The Town of Tonawanda will provide closing cost assistance for First Time Homebuyers to purchase a home in that Town. The assistance is in the form of a 0% deferred payment loan provided to potential homebuyers whose income is less than 80% of HUD area median income. \$20,000 in HOME EN will be allocated to this Program for FY2024.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Two households will be assisted.
	Location Description	Townwide

	Planned Activities	Approximately 2 households will be assisted. Provide closing cost assistance for First Time Homebuyers to purchase a home. The assistance is in the form of a 0% deferred payment loan provided to potential homebuyers whose income is less than 80% of HUD area median income.
20	Project Name	Tonawanda HOME Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	The Town of Tonawanda will use 10% of its HOME program income received in 2024 for admin. funding for staff to administer the HOME program in Town.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	The Town of Tonawanda will use 10% of its HOME program income received in 2023 for admin. funding for staff to administer the HOME program in Town.
21	Project Name	Administration Costs for the 5 Year Consolidated Plan
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Administration costs associated with the implementation of the 5 Year Consolidated Plan. The costs of \$7,000 will come from HOME Admin. 2020 funds.
	Target Date	3/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	Administration costs associated with the implementation of the 5 Year Consolidated Plan. The costs of \$7,000 will come from HOME Admin. 2020 funds.
22	Project Name	Amherst HOME Acquisition/Rehabilitation/New Construction Resale
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, or acquisition of a vacant lot and new construction of a single-family house for resale to an income eligible first-time homebuyer. It is doubtful that Amherst will find an existing lot or home with the market conditions right now, but if the opportunity presents itself Community Development will transfer funds from the HOME Rental subsidy or the first time homebuyer budget line to acquire the property in 2024.
	Target Date	3/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	One household
	Location Description	Town wide
	Planned Activities	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, or acquisition of a vacant lot and new construction of a single-family house for resale to an income eligible first-time homebuyer.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

The Town of Amherst encompasses approximately 50 square miles from Niagara Falls Boulevard in the west, Transit Road in the east, Tonawanda Creek Road in the north and Wehrle Drive in the south. There are no complete Census tracts in the Town that fall above 51% low-mod income, so the Town uses the upper quartile of low-mod concentration for its eligibility guide for federal assistance. The highest concentration of low-mod households can be found in the western portion of the Town, both north and south. This is the older portion of the Town that borders on the City of Buffalo and has the higher number of affordable housing units, both owner-occupied and rental as well. As the population ages in the Town other pockets of low-mod income elderly households become evident throughout the Town in many of the established "higher income" neighborhoods, which is why some of the projects are directed town wide.

Geographic Distribution

Target Area	Percentage of Funds
Egbertsville	40
Town Wide	40
Opportunity Zone - Census Tract 92	20

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Egbertsville target area has the highest percentage of assistance as it is the older part of the town and the housing stock needs more attention to maintain. The higher percentage of low-mod income households are also concentrated in this area of the Town. Finally, acquisition-rehab, and Land Bank activities are concentrated in this area. Amherst's Opportunity Zone area focuses on Census Tract 92, which is almost entirely consisted of qualifying LMI block groups. The decline of the Boulevard Mall has severely impacted employment in the area and the loss of area commercial use has seen an increase in vacant commercial buildings. Without a renewed effort to provide programming to address the economic conditions in the Boulevard Mall area, the town will see decline reverberate outward into the surrounding LMI homestead neighborhoods, which are already in poor shape.

Discussion

N/A

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The highest percentage of CDBG and HOME funds are directed to providing and improving the existing residential housing units with some acquisition and rehab of affordable housing units in the Consortium Towns. Amherst and Cheektowaga do not receive homeless assistance through ESG, but rely on the Homeless Alliance of WNY and Belmont Housing Resources for WNY, Inc. (PHA for Housing Choice Voucher Program/Section 8 rental assistance) to assist those at risk of homelessness. The Town of Tonawanda anticipates receiving ESG funds and is expected to assist approximately 15 homeless individuals in 2024. Housing Rehabilitation is the largest activity for retaining affordable housing stock throughout the Consortium. The ACT HOME Consortium also received an allocation of HOME-American Rescue Plan Act (ARP) funding in PY 2021 to address homelessness in the Consortium.

One Year Goals for the Number of Households to be Supported	
Homeless	15
Non-Homeless	200
Special-Needs	1
Total	216

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	2
Rehab of Existing Units	60
Acquisition of Existing Units	4
Total	76

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Amherst

In 2022 the town acquired a vacant parcel on Sunset Court to construct a three bedroom home, which was intended to be sold to an eligible first-time homebuyer. However, a sharp rise in construction costs and unfavorable soil conditions discovered on the site indicated led to the cancelation of that project. Funds from the 44 Sunset project will be redirected into the First Time Homebuyer Program which has now been revised to reflect more appropriate assistance necessary to assist buyers in the current housing market, and is a greater cost-benefit for assistance per household. The updated First-time Homebuyer program provides down payment subsidy in addition to the original closing cost 0% deferred loan. Approximately six first-time income eligible homebuyers will be assisted from the revamped First-

time homebuyer program. The majority of HOME funds in PY 2024 are allocated to the HOME Rental Subsidy which provides gap funding for multi-family affordable rental developments. The majority of the CDBG housing funds will be used for rehabilitation of income-eligible existing owner-occupied units through a 0% deferred loan program. .

Cheektowaga

The Town has acquired two vacant properties on Gardenvale and Peachrow and completed constructing single family homes on each parcel which sold to income-eligible first-time homebuyers. These projects were accomplished with entitlement funds and program income from the sale of previous acquisition/rehab and new construction/resale projects. The Town plans to continue its housing rehabilitation loan program for income-eligible existing owner-occupied units and also plans to relaunch its First-Time Homebuyer Program to provide closing cost assistance in the form of a 0% deferred payment loan.

Tonawanda

The majority of housing funds will be used for rehabilitation of income-eligible existing owner-occupied units through a 0% deferred loan program. A small portion of the funds will be used to fund a program that will assist approximately two first-time income eligible homebuyers with closing cost assistance in the form of a 0% deferred loan. Tonawanda's CDBG funding for affordable housing focuses on residential owner-occupied rehab, housing counseling services provided by Belmont Housing of WNY, and weatherization services. Tonawanda's ESG Homelessness Prevention and Rapid Re-Housing Programs round out the remainder of the program offerings and is discussed separately in Tonawanda's Action Plan.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The Towns of Amherst and Cheektowaga do not have public housing developments that the municipalities own. Multi-family rental units are owned privately and units are available with rental assistance through project specific vouchers or Section 8 rental assistance. There are approximately 10 subsidized housing complexes in Amherst and an additional four developments of affordable rental units that are not subsidized but below market rate. There are 8 low income housing apartment communities offering 471 affordable apartments for rent in Cheektowaga. Cheektowaga features 187 low income apartments with rental assistance where households typically pay no more than 30% of their income towards rent. Additionally, there are 284 other low income apartments that don't provide direct rental assistance but remain affordable to low income households in Cheektowaga.

Within the Town of Tonawanda, the Kenmore Housing Authority (KHA) has 194 units of public housing located in two mid-rise adjacent buildings with 97 units in each building. Up until 2006, the KHA administered 20 Section 8 Rental Vouchers for low-income families and the elderly. The Authority has since transferred that authorization to Belmont Housing Resources of WNY. The Authority is located at 657 Colvin Boulevard in the Village of Kenmore, New York. The Authority normally maintains full occupancy. There are 10 handicapped units in each building and there are no handicapped tenants in residence who need to be transferred to a handicapped unit. In terms of income, 50 percent of the tenants qualify as very low income being under 31 percent of the median income for the metropolitan area, 25 percent as low-income at 31-50 percent of the median income and 25 percent qualify as moderate income at 51-80 percent of the median income. Residents pay 30 percent of their income for rent. Additionally, HUD annually allots funds to cover all costs for operation and maintenance of the buildings. There are approximately 500 applicants on the Kenmore HA waiting list, including 200 applicants who qualify as handicapped. The KHA also has adopted a local preference ruling whereby all Village of Kenmore residents receive first priority, Town of Tonawanda residents receive second priority and all other applicants are placed on a third waiting list.

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

People Inc. responded to an RFP for a HOME Rental Subsidy project called Blocher Homes to be located in the Village of Williamsville. People Inc.'s passed final underwriting and closed on their HOME construction loan and HOME-ARP Grant in PY 2023. Construction of the 93 unit affordable housing project, 20 of which is set aside for persons with an identified disability, has commenced and will be completed in PY 2025.

Cheektowaga will continue to utilize existing neighborhoods to develop in-fill housing projects for low/moderate income home ownership. Cheektowaga will continue to acquire, rehabilitate, and resell affordable homes with the assistance of the Buffalo Erie Niagara Land Improvement Corporation (BENLIC) through their ability to acquire vacant and distressed tax foreclosed properties. Also,

Cheektowaga collaborates with Habitat for Humanity to sell their organization Town owned residential lots within neighborhoods to construct new affordable homes for their program. Habitat also collaborates with BENLIC to acquire vacant lots from the land bank through tax foreclosure auctions.

The Kenmore Public Housing Authority is going to continue to maintain its existing facilities. No additional units are planned in 2024. Tonawanda has committed PY21 and PY22 funds for a HOME Rental Subsidy project planned for construction in PY24 and PY25.

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

Amherst, Cheektowaga, and Tonawanda all work with our non-profit developers under HOME-funded programming to ensure that homeownership programs are advertised to and available to public housing residents, through direct mailers, postings in public housing complexes, and advertising in local minority papers. Such programs include First-time Homebuyer classes, First-time Homebuyer Closing Cost Assistance, and Financial Counseling. Also, Acquisition-Rehab/New Construction/resale projects are directly advertised to public housing residents via Belmont Housing Resources for WNY, since recipients of Section 8 vouchers, as the vouchers can be applied towards the mortgage.

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

N/A

Discussion

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

The Town does not receive any direct Entitlement homeless assistance but relies on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Housing Choice Voucher/Section 8 emergency housing assistance. In 2021, the American Rescue Plan Act awarded \$3.4 Million in HOME-ARP funding to the ACT Home Consortium. Amherst amended the 2021 Annual Action Plan to incorporate the proposed Allocation Plan for HOME-ARP funding. As mentioned previously, People Inc.'s Blocher Homes Apartments Project includes HOME-ARP funding for eleven (11) HOME-assisted units and is currently undergoing construction, with a completion and rent-up expected for 2025. The HOME-ARP assisted units will assist recipients of OPWDD vouchers who are at threat of homelessness.

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

Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for several people identified as being homeless in the Town. Amherst's Meals on Wheels Program has also stepped forward in these cases to provide daily meals. Community Development Block Grant funds are assisting the Amherst Meals on Wheels program to provide healthy nutritious meals to the Town's identified homeless individuals or families if requested. The Town's HUD approved HOME-ARP Plan aims to fund Supportive Services, Acquisition and Development of Non Congregate Shelters, Tenant Based Rental Assistance (TBRA), Development of Affordable Rental Housing, Non-profit Operating, Non-profit Capacity Building, as well as Administration and Planning.

Hearts for the Homeless emergency shelter will continue to operate their mobile soup kitchen. The motor home travels throughout the Towns and the City of Buffalo to find the homeless street people to provide food and clothing. At that time, the homeless are assessed as to their needs and referred to proper agencies for case management.

Compass House continues to enable youth to move to permanent housing and defray rent and utility arrears to prevent eviction and/or termination. The Salvation Army will also cover these same costs for adults who find themselves in similar situations.

New this year, Amherst's CDBG funding will also support the Child and Family Services of Erie County's Haven House. Haven House is a licensed domestic violence shelter with a Domestic Violence Program. CDBG funds will be used to provide a Child and Family Services Haven House Domestic Violence Advocate co-located with the Town of Amherst Police Department and Town Court in order to provide

services directly to victims. Among other services the advocate will also assist victims with completing applications to the Office of Victim Services (OVS).

The Police Departments and the administrators of the emergency rooms of Kenmore Mercy Hospital in Tonawanda, St. Joseph's Hospital in Cheektowaga and Millard Fillmore Suburban Hospital in Amherst will work together to identify the homeless, assess their needs, and refer them to the appropriate agencies.

Addressing the emergency shelter and transitional housing needs of homeless persons

As mentioned before, grant funds are available to assist victims of domestic violence in emergency situations through the Town of Amherst Family Offense Unit of the Police Department. Additional funds provide support through the Children and Family Services Haven House, a domestic violence shelter with a Domestic Violence Program. Funding is will be used for Domestic Violence Advocate which conducts case management and acts as a liaison between the victim and the Town Court and Police Department.

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

Low and moderate income households sometimes find themselves in a situation where they "lose ground" in terms of their housing situation. The Town will continue to develop its programs that assist existing low and moderate income residents so that they can maintain their current residential situations. This includes homeowner rehabilitation assistance and weatherization assistance for owners and renters.

The Town will contract with Belmont Housing Resources for WNY, Inc. and Buffalo Urban League to provide advocacy and counseling to homeowners who are refinancing homes in order to consolidate consumer debt. The Town will also provide a copy of relevant HUD brochures, and refer residents to Belmont and Buffalo Urban League when past housing rehabilitation clients seek to refinance their homes.

Additional services are provided through Belmont for credit and mortgage default counseling and the Buffalo Urban League for legal assistance for foreclosure prevention and loan modification for homeowners at risk of losing their homes through job loss, costly medical emergencies, etc.

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.

Aside from the programming mentioned already, the Town continues to make strides in homeless prevention through Fair Housing Counseling and Tenant-Landlord Mediation provided by Housing Opportunities Made Equal, and staff participation with HAWNY and the Erie County Fair Housing Partnership. Community Development staff has worked with the Partnership to develop workshops on mortgage loans, mortgage modification and foreclosure prevention in order to better prepare and educate potential homebuyers and current homeowners involved in home buying activities, refinancing or mortgage modification.

The Town will continue to contract for the provision of housing counseling activities to homebuyers, homeowners and renters through Housing Opportunities Made Equal. This counseling will educate residents on their personal responsibilities in managing their financial affairs to maintain a healthy credit rating, as well as their opportunities to improve their own financial circumstances.

Discussion

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The Town's Community Development staff participates in the Homeless Alliance for WNY's (HAWNY) NY-508's 10 year planning to address homelessness in WNY. HAWNY's plan for Erie County, "Opening Doors: Buffalo and Erie County's Plan to End Homelessness (2012)", was also recently updated in 2016 among the priorities it sets for the community are: permanent housing for the chronically homeless, permanent housing for clients dealing with mental illness and/or substance abuse issues (MICA) clients.

The Town of Amherst continues to act as the lead applicant PHA for the Erie County PHA Consortium. In this role the Town contracts with Belmont Housing Resources WNY to act as the management agent for the day-to-day operation of the Section 8 Housing Choice Voucher Program. (It should also be noted that Belmont acts as a participant in the Prism Project Forum.) The PHA has a set-aside of rent vouchers for the homeless and also for youth aging-out-of-foster care, who have higher rates of homelessness. Crisis Services refers eligible clients to Belmont for these rent subsidies.

The PHA also has vouchers under the VASH (Veterans Administration Supportive Housing) program. These are available to homeless veterans with substance abuse/mental health issues. The Homeless Outreach program through the local VA hospital is a very involved partner with Belmont in linking these rent subsidies with follow-up care to providing a stabilizing force in these persons' lives (community-oriented outreach, clinical care and case management services).

Transitional Services, Inc. operates a community residence for 13 adults on North Ellicott Creek Road in the Town of Amherst. The agency provides opportunities for community living for persons with mental health issues. Staff provides individual assessment, rehabilitation services, case management and supportive counseling to each unique individual. The Town of Amherst is also host to sixty-six (66) group homes for the developmentally disabled.

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

Amherst is currently undergoing changes to its residential, commercial and office space markets. While housing values soar, commercial and office demand is decreasing and demographics are shifting. To address these changes, in recent years the Town amended the comprehensive plan and zoning code to encourage mixed use/form based codes in older commercial clusters in town.

These zoning amendments will affect affordable housing stock in town through the reinvestment of many of Amherst's affordable neighborhoods and introduction of additional housing-type options. Amherst's Community Development staff will continue to stay involved with the project to ensure

affordability is a component of the zoning and to align any other HUD funding priorities necessary to support affordable housing development. Recent zoning amendments include updates to the Town's Accessory Dwelling Unit Standards. Aspects of the old code were found to be incompatible with the housing needs of the residents especially for those who desired to establish an Accessory Dwelling Unit to serve a family member who is a senior or disabled. Most zoning districts in the Town require a Special Use Permit to establish an ADU and among the zoning amendments were changes to the Special Use Permit requirements to be less restrictive and open to more diverse housing arrangements.

In addition, Amherst Community Development Staff are undertaking new initiatives with the Planning Department and Amherst Industrial Development Agency (AIDA) to support the creation of affordable housing in Town. Recently, the Town was awarded the NYS Homes and Community Renewal's Plus One Accessory Dwelling Unit (ADU) Grant Program in order to foster private ADU development in Town, as well as evaluate zoning code amendments that will improve permissibility of ADUs. The goal of this Grant Program is to establish eight (8) new ADUs and to rehab eight (8) existing non-conforming ADUs in two funding rounds in Program Year 2024. After income qualifying, Projects will be scored and selected based on the project's feasibility and given extra consideration if the units provide affordable tenancy and is close proximity of public transit. With the AIDA, Amherst staff are assisting in defining and establishing criteria on "affordable units" for incorporation into AIDA programming requirements to be applied to for-profit market-rate and workforce housing projects seeking public assistance.

Discussion

The Town continues its program to rehabilitate existing low-income, owner-occupied, single-family and two-family housing by providing a 0% interest deferred payment loan through the CDBG and HOME Programs. Approximately twenty (20) single-family units and one(1) two-family unit will be rehabilitated. (Town/Village-wide)

For Program year 2024, it was decided that the funds would be redirected into the First-Time Homebuyer program with an increased subsidy which provides a greater economic impact for low income individuals and families looking to purchase a home in the Town of Amherst. Weatherize existing low income owner occupied housing and rental housing (excluding multi-unit complexes) units through the Weatherization Assistance Program funded by the Department of Energy and administered through Supportive Services Corporation. Approximately twenty (20) Amherst units will be weatherized, using current year's and previous years' funds. (Town/Village-wide)

The Town will continue to support the activities of the Erie County Fair Housing Partnership and actively participated in a 2023 Conference and other activities scheduled for April, Fair Housing Month.

The Town's CDBG and HOME housing programs do offer rehabilitation loans to single family homeowners and owner occupied two family units to provide accessibility repairs.

The Town of Amherst will continue to act as the lead PHA for the Erie County PHA Consortium, acting as

a conduit for Section 8 rental subsidies for eligible, very low income households in Erie County.

Continue to support:

Eligible applications for newly created rental units for low-income visually and/or physically impaired residents.

An application for new rental units for low income elderly through the Section 8/Section 202 New Construction Program if funding becomes available.

Payment in Lieu of Taxes (PILOTs) agreements between the Town, County, School Districts and Owner/Developers of Affordable Housing.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The Consortium communities recognize that housing programs by themselves will not eliminate or reduce poverty. Subsidized programs such as those targeted in the Consortium Consolidated Plan can free up cash resources for living necessities, but these programs alone cannot raise a household above the poverty level.

The Consortium Towns, understanding the importance of coordination between public and private housing and social service agencies, have developed the Consolidated Plan through consultation and cooperation with such agencies. In doing so, the Towns have established a working relationship with numerous social and housing service providers which will serve as a foundation for coordination and cooperation in the implementation of the Annual Action Plan. Acknowledging that each agency plays a specific role in providing different types of services, the Towns will adhere to a policy of encouraging ongoing communication, referrals and exchange of information among these agencies. Such a policy will allow the Towns to serve as catalysts to help ensure that the full range of appropriate resources are made known and available to service agencies in order to provide a thorough and complete approach to meeting priority housing, social and health needs of low income persons.

Where appropriate and feasible, the Consortium Towns will coordinate their housing programs with services designed to assist low income households to break the cycle of poverty.

Actions planned to address obstacles to meeting underserved needs

The Town of Amherst acts as lead PHA for the Erie County PHA Consortium. In this capacity, it contracts with Belmont Housing Resources for WNY to administer the Section 8 rent subsidy programs in Erie County. The Erie County P.H.A. has established an Action Plan for the Family Self-Sufficiency Program. This program provides rent subsidies to eligible households in concert with other social services and programs on terms that encourage personal responsibility leading to financial independence.

The bank financing for home repair loans for low and moderate income persons reduces the amount of their disposable income with the potential of placing the low and moderate income person into poverty. The Consortium Towns offer a 0% deferred payment loan to low and moderate income persons to make house repairs which is payable when the house is sold.

In addition, Erie County's work force development offices provide training and employment opportunities to:

Economically disadvantaged adults who need training and job skills to secure employment.

Dislocated workers who are economically disadvantaged and have been laid off and are waiting to be

recalled to the same or similar occupation, for example, a steel worker.

Provide a summer job to youth who are from low and moderate income families along with on-the-job education classes for the duration of their job.

Employment opportunities may be available for Community Development projects under the Section 3 requirements. Section 3 provides benchmarks for contractors to meet on hiring/utilizing low-income labor on projects over \$200,000. The new Section 3 regulations substantially incentivize contractors to maintain low-income hires over a longer-term and work with Youth Build agencies on job training.

Actions planned to foster and maintain affordable housing

The Consortium Towns will continue to undertake housing rehabilitation, acquisition-rehab-resale projects, and first time homebuyer activities. Additionally, Amherst funds and coordinates with agencies that provide housing counseling, foreclosure prevention, landlord-tenant education, and housing and services for victims of domestic violence. By focusing on geographic target areas with low-mod populations, and assisting low-mod income households, the Town assists residents with various aspects of obtaining and maintaining affordable housing. New in recent years is the addition of a subsidy to non-profit developers to foster new rental housing for LMI populations in all three consortium towns.

Beginning in FY2019 The Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium has also established our own HOME Value Limits as outlined in 24 CFR §92.254 (a)(2)(iii) to establish a new HOME Value Limit for 1-unit existing structures. Over the last several years there has been a tremendous increase in housing values in the Towns of Amherst, Cheektowaga and Tonawanda. The ACT HOME Consortium has had difficulty utilizing HOME Investment Partnership funding for our Homeowner Rehabilitation Programs due to the increase in housing values above these limits. The current value limits also greatly affect low-income seniors in need of home repairs, as most often their home's assessed values exceed these limits.

In addition, it has become increasingly difficult to perform a HOME-funded Acquisition-Rehab-Resale project and keep the rehabilitated home under these value limits, even in lower-income areas. As a result the Consortium is limited in its ability to provide affordable housing programming in middle-to-higher-income neighborhoods for rehabilitated homes will appraise higher than these value limits.

To establish our HOME Value Limits an initial market analysis was conducted in accordance with 24 CFR §92.254 (a)(2)(iii) for 1-unit existing homes. The resulting HOME Value Limit is \$266,000. The methodology applied included collecting sales data from each Town Assessor for the months of June, July and August of 2023 for single-family homes (Code 210) with arms-length sales. The number of sales were 527; resulting in the need for three months of sales data for the analysis. The median sale value of the data set is \$280,000, that figure multiplied by 95% generates the value limit of \$266,000. The corresponding spread sheet with the Assessors' data used to arrive at this figure is available for review

at the Amherst Planning Department.

The ACT Consortium has requested HUD's approval of this methodology and received approval for the established 1-unit Existing Structure HOME Value Limit. The Consortium will continue to use the HUD established HOME Value limits for the remaining 2-unit, 3-unit and 4-unit for existing homes, and for 1-4 units for all new builds.

It should also be noted that the Consortium only intends to apply the new (existing home) Home Value Limits to our Homeowner Rehab Programs and Acquisition-Rehab-Resale Projects, as this value is unaffordable to families seeking First-Time Homebuyer Closing Cost Assistance. This rule will be applied as an internal policy. We will also continue to provide a purchase subsidy on the Acquisition-Rehab-Resale projects to ensure the home value is affordable to low-income homebuyers.

Actions planned to reduce lead-based paint hazards

The Consortium Towns will continue to undertake the following action to control lead based paint hazards during Fiscal Year 2024.

Houses built prior to 1978 showing deteriorated paint surfaces, exterior and interior, will be tested and if lead based paint is found it will be addressed. The three towns have sponsored renovators' and remodelers' training for housing rehabilitation contractors offering certifications for inspections and procedures. Also, the Community Development offices will continue to notify contractors of new education/training opportunities offered during the year for the federally required interim control procedures.

Actions planned to reduce the number of poverty-level families

There is currently no economic development or job training program available in the Town directly through CDBG funding. However, the assistance provided through the other CDBG programs to lower-income households will relieve some of the financial burden and provide affordable options for housing, thus reducing some of the strain on household budgets.

Actions planned to develop institutional structure

N/A

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

service agencies

N/A

Discussion

N/A

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

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.

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	60,000
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:	60,000

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.	90.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

The Towns of Amherst, Cheektowaga and Tonawanda, through the A-C-T HOME Consortium, expect to receive HOME Investment Partnership Grant funds that will be used to rehabilitate owner-occupied homes needing repair and assist income-qualified first-time homebuyers by providing the money needed to cover closing costs and or down payment assistance. This homebuyer assistance may enable previously underserved rental households to consider the possibility of home-ownership. The outreach activities in support of first-time homebuyer assistance will include advertising, informational workshops, financial education and additional counseling with follow-up post-purchase counseling to further ensure the success of homeownership.

Five Year goal: 50 low-mod income: A C I

First-time homebuyers assisted: 20 20 10

2024 goal: low-mod homebuyers assisted: 6 0 2

5-Yr. Sect. 215 goal: 50 low-mod income homebuyers assisted

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Amherst, Cheektowaga, Tonawanda HOME Consortium does not incorporate RESALE provisions in any of the HOME activities.

The Consortium Towns will utilize the “Shared Net Proceeds” recapture provision for the repayment of these loans in the event there are insufficient funds to repay the loan and homebuyer equity at the time of future resale of the property. See 24 CFR 92.254(a)(5)(ii)(A)(3). Under the recapture option, the PJ recovers all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the qualified low-income family that purchased the unit for the duration of the period of affordability.

The PJ and the homebuyer share the net proceeds based upon the ratio of the HOME subsidy to the sum of the homebuyer's investment plus the HOME subsidy. As per the written HOME Agreements for the Amherst, Cheektowaga, Tonawanda Consortium’s Homebuyer Program:

“If the HOMEBUYER either sells the PROPERTY or gives up residence at the PROPERTY, he/she shall repay to the TOWN the full amount of the affordable housing subsidy. He/she shall make this repayment to the TOWN within ninety (90) days of his/her sale of the PROPERTY or termination of residency at the PROPERTY. However, if the PROPERTY is sold and the sales price minus the cost of repaying the first mortgage and minus closing costs is insufficient to repay both the full amount of the affordable housing subsidy and the HOMEBUYER’S investment, then the HOMEBUYER shall

repay the TOWN only a pro-rated portion of the affordable housing subsidy. In such a case, the pro-rated portion the HOMEBUYER shall repay to the TOWN shall equal the amount yielded by the following formula:"

$$\frac{\text{HOME investment} \times \text{Net Proceeds}}{\text{HOME investment} + \text{HOMEBUYER investment}} = \text{HOME amount to be recaptured}$$

GEOGRAPHIC LOCATION: Townwide in each of the three Towns, including the Villages, in the Consortium.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The Towns of the Amherst HOME Consortium do not use the Resale guidelines.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to utilize HOME funds to refinance existing debt secured by multifamily housing.