



# **ANNUAL ACTION PLAN FY 2023**

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

**April 1, 2023 - March 31, 2024**

**Town of Amherst Community Development**



# 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 2023 Annual Action Plan is the third year 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 2023 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 17, 2022 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, 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 2023 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 2021 PY, Amherst provided \$391,046.90 in housing rehab loans to twenty- three (23) single family homeowners. \$237,701 in CDBG funds, \$78,094.90 in HOME funds, and \$75,251.00 in NYS Affordable Housing Corporation's matching grant funds expended during this period. Lead paint hazards were remediated from eight (8) homes and sixteen (16) homes were weatherized in Amherst. HOME funds were also used to assist one (1) individual first-time homebuyer in purchasing homes in Amherst during the 2022 program year (a total of \$10,355).

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. Both homes will be sold to an eligible first-time homebuyer. In Cheektowaga, two single family homes started construction during the 2021 Program Year, one on Peachrow, and one on Gardenvale. These projects are anticipated to be completed in PY 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.

In Cheektowaga, \$71,949 of HOME funds were spent on three (3) housing rehabilitation activities and one 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. Three (3) Cheektowaga properties that had lead-based paint were also remediated in 2021. In Tonawanda, \$248,150 of HOME funds were spent in PY 2021 on housing rehabilitation for five (5) single-family homes, of which 4 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 2023 Draft Annual Action Plan is January 17, 2023, and were required to be submitted in writing to Amherst Community Development, 5583 Main Street, Williamsville, NY 14221 or to [communitydevelopment@amherst.ny.us](mailto: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.

These are comments received during the first public comment period held in October 2022:

- A bike rack for ECO Park on Crosby Boulevard (This is a very popular place in our neighborhood so having a place to park bikes would be very helpful)
- Seating/benches at the bus stops at Maynard Drive and Grover Cleveland Highway (Between the #44 and UB Stampede bus routes, this is actually the busiest bus route in the entire town, with roughly 350 buses passing by on peak days. There are often many students waiting for the buses at these 2 bus stops so a bench would be very beneficial for a large number of people)
- Seating/benches at the bus stops at Main Street and Eggert Road. (The #47 and #48 bus routes pass through this intersection and are some of the busier bus routes that run through the town. There often people waiting for buses here, including myself, who would benefit from a place to sit and wait comfortably)

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

Each of these resident project ideas were followed up on for feasibility and jurisdictional limitations. The bike rack at Eco Park on Crosby Boulevard is indeed in an LMI area, but the Youth Parks and Recreation Dept is currently undergoing a new park design for that location. Therefore, it was decided by the funding committee that this should not be funded this year in an effort to not interfere with a current Town project. The comment, however, was still forwarded on to the Youth and Recreation Executive Director for consideration of including it in the new park plan going forward. The seating for the UB bus stop at Maynard Drive and Grover Cleveland as well as the bench for the NFTA bus stop at Main Street and Eggert Road were considered by the committee but were found to not be feasible due to jurisdictional limitations. Both locations are within NYS Right-of-Ways which restricts anything from being placed in the boundary unless given the authority from the State. As a result, it was found that neither of the bench placement suggestions could be accomplished with this year's CDBG funds due to the inability to control or develop in the ROWs.

**7. 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 2023 total \$628,897. 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 \$1,010,939 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 for the Town of Amherst.

**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	<b>Agency/Group/Organization</b>	Belmont Housing Resources for WNY, Inc.
	<b>Agency/Group/Organization Type</b>	Housing PHA Services-homeless Service-Fair Housing Regional organization Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	Buffalo Urban League Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Education Services-Employment Service-Fair Housing Regional organization Foundation

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities Services-Education Service-Fair Housing Regional organization Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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: <a href="http://www.amherst.ny.us/community">www.amherst.ny.us/community</a> (under Fair Housing). A landlord-tenant training and fair housing video are typically scheduled in the Town as a Fair Housing Month activity.

4	<b>Agency/Group/Organization</b>	YWCA
	<b>Agency/Group/Organization Type</b>	Housing Services-Victims of Domestic Violence Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The YWCA of WNY, Inc. operates four units of transitional housing in the Town of Amherst for homeless victims of domestic violence. The YWCA coordinates with area shelters to provide case management and assistance with issues relating to illness, credit, crime, and lack of education or employment. The organization is applying for CDBG funds for case management and transportation assistance.

**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 17, 2022. Second Public Hearing will be held at the second Town Board meeting in January 2022.	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 2022; ad in Amherst Bee for notice of availability of draft Annual Action Plan available for review in December 2022.	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 \$628,897 in Community Development Block Grant funding for 2023, with roughly \$80,000 in program income received during the program year. The Amherst, Cheektowaga, Tonawanda (A-C-T) HOME Consortium will receive \$1,010,939 in 2023 HOME Investment Partnerships Grant funding, with an anticipated \$500,000 in program income from HOME housing rehabilitation and homebuyer and acquisition-rehabilitation-resale activities. 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	628,897	80,000	0	708,897	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	1,010,939	500,000	0	1,510,939	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 publically 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: \$309,100 HOME: \$630,450	Rental units rehabilitated: 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: 4 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: \$63,000	Homelessness Prevention: 150 Persons Assisted
4	Weatherization Assistance	2020	2024	Affordable Housing	Town Wide	Weatherization Assistance	CDBG: \$10,000	Homeowner Housing Rehabilitated: 10 Household Housing Unit
5	Affirmatively Further Fair Housing	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG: \$8,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
6	Historic Preservation/Elimination of Slum & Blight	2020	2024	Preservation	Town Wide	Historic Preservation	CDBG: \$42,700	Facade treatment/business building rehabilitation: 1 Business
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
8	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Eggertsville Opportunity Zone - Census Tract 92	Neighborhood Beautification and Infrastructure	CDBG: \$39,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

**Table 3 – Goals Summary**

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Improve Housing Stock
	<b>Goal Description</b>	<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><b>CDBG: Amherst \$326,674 (plus \$80,000 Program Income)</b>  <b>HOME: Amherst \$203,281 (plus \$90,000 PI); Tonawanda \$283,282 (\$90,000 in Program Income); Cheektowaga \$151,641 (\$180,000 Program Income)</b></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 serving LMI seniors, disabled, special populations. The program will generate approximately 2 HOME subsidized units, assisting 2 households.</p> <p><b>HOME: Amherst \$100,000 EN funds are allocated.</b></p>

2	<b>Goal Name</b>	Promote Affordable Homeownership
	<b>Goal Description</b>	<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><b>HOME: Amherst - Assist 4 homebuyers; (ample prior year funding).</b>  <b>HOME: Tonawanda – Assist 2 homebuyers; \$20,000 allocated.</b></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><b>CDBG Acquisition: Amherst - \$0; (ample prior year funding).</b>  <b>HOME: Amherst - \$0, (ample prior year funding), prior years program income will also be applied.</b>  <b>HOME: Cheektowaga - \$151,641, prior years' program income will also be applied.</b></p>



3	<b>Goal Name</b>	Assistance to At-Risk Pop/Reduce Homelessness Risk
	<b>Goal Description</b>	<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 YWCA of WNY, Belmont Housing Resources for WNY, and Buffalo Urban League to prevent homelessness of certain at-risk populations.</p> <p>The YWCA works with victims of domestic violence in Amherst and provides temporary housing and supportive service programming to help the women and their families to escape violence and become self-sufficient. The YWCA provides case management services for homeless domestic violence victims, with four housing units in the Town of Amherst.</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>Family Justice Center provides advocate assistances for individuals in unsafe relationships and victims of domestic violence in order to ensure safe shelter is maintained. CDBG funds will cover the cost of Domestic Violence Advocates to assist in-person clients at an Amherst satellite site and via phone.</p> <p>Amherst will utilize CDBG funding to provide this assistance and aims to assist 200 households.</p> <p><b>CDBG: Amherst - \$6,000 Buffalo Urban League</b></p> <p><b>CDBG: Amherst - \$30,500 YWCA</b></p> <p><b>CDBG: Amherst - \$16,500 Belmont Housing Resources for WNY</b></p> <p><b>CDBG: Amherst - \$10,000 Family Justice Center</b></p>

4	<b>Goal Name</b>	Weatherization Assistance
	<b>Goal Description</b>	<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><b>CDBG: Amherst – 10 units assisted, \$10,000 allocated</b></p>
5	<b>Goal Name</b>	Affirmatively Further Fair Housing
	<b>Goal Description</b>	<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><b>CDBG: Amherst - \$8,000 Allocated</b></p>
6	<b>Goal Name</b>	Historic Preservation/Elimination of Slum & Blight
	<b>Goal Description</b>	<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><b>CDBG: Williamsville - \$44,203 allocated.</b></p>
7	<b>Goal Name</b>	Community Services
	<b>Goal Description</b>	<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 for an additional FT cook to meet the increased demand for meals within the program. The program is expected to benefit approximately 400 seniors in 2023.</p> <p><b>CDBG: Amherst - \$40,000 allocated to Meals on Wheels.</b></p>

<b>8</b>	<b>Goal Name</b>	Public Facilities and Infrastructure
	<b>Goal Description</b>	<p>CDBG Public Infrastructure will focus on necessary sewer work and sidewalk replacement needed in eligible LMI target areas of the Town.</p> <p><b>CDBG: Amherst - \$39,000 EN</b></p>

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

#	Project Name
1	Amherst CDBG Housing Rehabilitation
2	CDBG General Program Administration
3	CDBG Office Expenses
4	Public Information and Advertising
5	Lead Based Paint Testing and Clearance
6	Weatherization Program for Single Family Homes
7	Belmont Housing Counseling Services
8	Buffalo Urban League Foreclosure Prevention Services
9	Fair Housing Counseling through Housing Opportunities Made Equal
10	Family Justice Center
11	Village of Williamsville Public Facilities and Historic Preservation
12	YWCA, Inc. Transitional Housing
13	Public Facilities and Infrastructure
14	Meals on Wheels
15	Amherst Housing Rehab (HOME)
16	Amherst First Time Homebuyer Program (HOME)
17	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME)
18	Amherst HOME Administration
19	Amherst HOME Rental Subsidy
20	Cheektowaga Housing Rehabilitation (HOME)
21	Cheektowaga CHDO Acquisition-Rehabilitation/ New Construction
22	Cheektowaga HOME Admin
23	Tonawanda Residential Rehabilitation (HOME)
24	Tonawanda First-Time Homebuyer Closing Cost Assistance (HOME)
25	Tonawanda HOME Administration

**Table 4 – Project Information**

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

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Amherst CDBG Housing Rehabilitation
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Improve Housing Stock
	<b>Needs Addressed</b>	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	<b>Funding</b>	CDBG: \$308,674
	<b>Description</b>	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. \$308,674 CDBG Rehab (EN), plus \$80,000 anticipated CDBG Program Income received FY23 to supplement entitlement funds. CDBG housing rehab for 2023 will be accomplished with entitlement funds and program income.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 25 households will be assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	HUD Matrix Code 14A
<b>2</b>	<b>Project Name</b>	CDBG General Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$95,000
	<b>Description</b>	These funds are used for staff administration of the CDBG Grant. \$95,000 will be utilized from entitlement funding.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	HUD Matrix Code 21A Administration of all CDBG funded activities.
<b>3</b>	<b>Project Name</b>	CDBG Office Expenses
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$1,200
	<b>Description</b>	Office supplies, copying costs and mailing expenses for administration of CDBG Programming.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	Public Information and Advertising
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$2,000
	<b>Description</b>	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.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	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.
5	<b>Project Name</b>	Lead Based Paint Testing and Clearance
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Housing Stock
	<b>Needs Addressed</b>	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental Acquisition Rehabilitation/New Construction Resale
	<b>Funding</b>	CDBG: \$8,000
	<b>Description</b>	Lead-based paint risk assessment/evaluation for CDBG and HOME rehabilitation activities and clearance testing after repairs.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	HUD Matrix Code 14I A risk assessment of the presence of lead based paint hazard by the Town's contracted qualified environmental firm prior to rehabilitation work, and the clearance testing required at the completion of the work to ensure the elimination of the lead hazard.
6	<b>Project Name</b>	Weatherization Program for Single Family Homes
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Weatherization Assistance
	<b>Needs Addressed</b>	Weatherization Assistance
	<b>Funding</b>	CDBG: \$10,000



	<b>Description</b>	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.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 10 housing units will be assisted with weatherization services.
	<b>Location Description</b>	
	<b>Planned Activities</b>	HUD Matrix Code 14F Housing rehabilitation with the sole purpose of improving energy efficiency.
<b>7</b>	<b>Project Name</b>	Belmont Housing Counseling Services
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Assistance to At-Risk Pop/Reduce Homelessness Risk
	<b>Needs Addressed</b>	Housing Counseling & Foreclosure Prevention Assist
	<b>Funding</b>	CDBG: \$16,500
	<b>Description</b>	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.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 persons assisted.
	<b>Location Description</b>	Town-wide

	<b>Planned Activities</b>	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.
8	<b>Project Name</b>	Buffalo Urban League Foreclosure Prevention Services
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Assistance to At-Risk Pop/Reduce Homelessness Risk
	<b>Needs Addressed</b>	Housing Counseling & Foreclosure Prevention Assist
	<b>Funding</b>	CDBG: \$6,000
	<b>Description</b>	Counseling and legal assistance for income eligible Amherst Homeowners to avoid mortgage default and/or predatory lending situations. Additional assistance is available for credit counseling and credit restructuring and foreclosure prevention. This activity will be funded with \$6,000 of entitlement funds.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 households assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	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.
9	<b>Project Name</b>	Fair Housing Counseling through Housing Opportunities Made Equal
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Affirmatively Further Fair Housing
	<b>Needs Addressed</b>	Fair Housing Counseling

	<b>Funding</b>	CDBG: \$8,000
	<b>Description</b>	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: <a href="http://www.amherst.ny.us/community">www.amherst.ny.us/community</a> (under Fair Housing). A landlord-tenant training and fair housing video are typically scheduled in the Town as a Fair Housing Month activity.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	120 individuals assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	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.
<b>10</b>	<b>Project Name</b>	Family Justice Center
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Assistance to At-Risk Pop/Reduce Homelessness Risk
	<b>Needs Addressed</b>	Assist Victims of Domestic Violence
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	The FJC, serves individuals in unsafe relationships and victims of domestic violence. Domestic Violence Advocates assist in-person clients at an Amherst satellite site, and would primarily serve remote Amherst clients via phone and online chat. CDBG funds will cover the cost of an additional staff member dedicated to Amherst clients.
	<b>Target Date</b>	3/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	70 persons assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	HUD Matrix Code 05G Domestic Violence Advocates provide a hybrid model of in-person and remote service to victims and survivors. CDBG funding covers the cost of an Advocate for the satellite site in the Town.
<b>11</b>	<b>Project Name</b>	Village of Williamsville Public Facilities and Historic Preservation
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Historic Preservation/Elimination of Slum & Blight
	<b>Needs Addressed</b>	Historic Preservation
	<b>Funding</b>	CDBG: \$44,023
	<b>Description</b>	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 Section 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.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 facility assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	HUD Matrix Code 16B The Historic Section House project will cover the stabilization and any outside repairs needed. The Historic Meeting House project will cover repairs to the front door.
<b>12</b>	<b>Project Name</b>	YWCA, Inc. Transitional Housing
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Assistance to At-Risk Pop/Reduce Homelessness Risk

	<b>Needs Addressed</b>	Assist Victims of Domestic Violence
	<b>Funding</b>	CDBG: \$30,500
	<b>Description</b>	Four households in designated homes in the northwest portion of the Town will receive services including case management and transportation assistance. The supportive housing provides shelter for low-income domestic violence victims/battered spouses and their children (four adult females and fourteen children). The CDBG funds are being used to pay for bus passes and for a portion of case management salaries.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 households assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	HUD Matrix Code 05G Public service activities including case management to address barriers and regain self-sufficiency, and transportation for domestic violence victims. Transitional housing and supportive service programming for homeless women and their children.
<b>13</b>	<b>Project Name</b>	Public Facilities and Infrastructure
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities and Infrastructure
	<b>Needs Addressed</b>	Neighborhood Beautification and Infrastructure
	<b>Funding</b>	CDBG: \$39,000
	<b>Description</b>	Public Infrastructure and Facilities Projects will look to address sewer infrastructure work, sidewalks, and ADA compliance needed in eligible LMI areas of the Town.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 households assisted.
	<b>Location Description</b>	LMI area

	<b>Planned Activities</b>	Matrix Code 03L – Sidewalks Matrix Code 03J – Water/Sewer Improvements
<b>14</b>	<b>Project Name</b>	Meals on Wheels
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Community Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	The Amherst Senior Center will utilize \$40,000 towards the payroll of an additional full time cook for the Meals on Wheels program which provides nutrition services to senior citizens.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	400 persons assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	Matrix code 5A Senior Services
<b>15</b>	<b>Project Name</b>	Amherst Housing Rehab (HOME)
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Improve Housing Stock
	<b>Needs Addressed</b>	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	<b>Funding</b>	HOME: \$203,281
	<b>Description</b>	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. Anticipated \$90,000 of HOME Program Income to be received FY23. Allocated \$203,281 in EN funds. The Town's State AHP Grant will supplement the funding in target areas.
	<b>Target Date</b>	3/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 households assisted
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	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.
16	<b>Project Name</b>	Amherst First Time Homebuyer Program (HOME)
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Promote Affordable Homeownership
	<b>Needs Addressed</b>	Homebuyer Assistance for Affordable Housing
	<b>Funding</b>	:
	<b>Description</b>	Closing Cost Assistance 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 2023 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 previous program years.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 households assisted.
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	Matrix Code 13 Direct Homeownership assistance to LMI households.
17	<b>Project Name</b>	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME)
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Promote Affordable Homeownership

	<b>Needs Addressed</b>	Acquisition Rehabilitation/New Construction Resale
	<b>Funding</b>	:
	<b>Description</b>	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. Amherst will acquire at least one home or vacant lot in 2023, allocating program income earned from the sale of 345 Grover Cleveland and 44 Sunset Court.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 household
	<b>Location Description</b>	
	<b>Planned Activities</b>	HUD Matrix Code 14G One home will be rehabilitated or a new home constructed and sold to a first time homebuyer through a non-profit owner/developer. A purchase subsidy will be available to supplement the closing cost homebuyer assistance, to make the home more affordable.
<b>18</b>	<b>Project Name</b>	Amherst HOME Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	HOME: \$101,094
	<b>Description</b>	Funds for staff and office costs for oversight and implementation of HOME activities: \$101,094. 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 \$111,094 to utilize towards admin.
	<b>Target Date</b>	



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	HUD Matrix Code: 21H Oversight and administration of the HOME Investment Partnership Grant for the Amherst HOME Consortium.
<b>19</b>	<b>Project Name</b>	Amherst HOME Rental Subsidy
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Improve Housing Stock
	<b>Needs Addressed</b>	New Rental Housing for Special Needs Populations
	<b>Funding</b>	HOME: \$100,000
	<b>Description</b>	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 2023, \$100,000 in HOME EN funds are allocated.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 HOME assisted unit
	<b>Location Description</b>	
	<b>Planned Activities</b>	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
<b>20</b>	<b>Project Name</b>	Cheektowaga Housing Rehabilitation (HOME)
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Housing Stock

	<b>Needs Addressed</b>	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	<b>Funding</b>	HOME: \$151,641
	<b>Description</b>	The Town of Cheektowaga will allocate \$180,000 RL and \$151,641 of EN for FY2023 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.
	<b>Target Date</b>	3/31/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 homeowners assisted
	<b>Location Description</b>	
	<b>Planned Activities</b>	Approximately 10 low and moderate income homeowners will be assisted.
21	<b>Project Name</b>	Cheektowaga CHDO Acquisition-Rehabilitation/ New Construction
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Promote Affordable Homeownership
	<b>Needs Addressed</b>	Acquisition Rehabilitation/New Construction Resale
	<b>Funding</b>	HOME: \$151,641
	<b>Description</b>	Acquisition of a vacant and/or foreclosed property for rehabilitation or new construction of a single-family home and resale to an income-eligible first time homebuyer. Cheektowaga is allocating \$151,641 of HOME EN funding. Will use prior years program income to supplement.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 household assisted
	<b>Location Description</b>	

	<b>Planned Activities</b>	Approximately 1 low-moderate income family or individual will benefit from the creation or rehab of the single-family home.
<b>22</b>	<b>Project Name</b>	Cheektowaga HOME Admin
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	The Town of Cheektowaga will use 10% of its HOME program income received in 2023 for admin funding for staff to administer the HOME program.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>23</b>	<b>Project Name</b>	Tonawanda Residential Rehabilitation (HOME)
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Improve Housing Stock
	<b>Needs Addressed</b>	Residential Rehabilitation-Owner-Occupied Residential Rehab-Owner-Occupied Military Grant Handicapped Accessibility Residential Rehab-Owner Occupied Rental
	<b>Funding</b>	HOME: \$283,282
	<b>Description</b>	The Town of Tonawanda will allocate \$283,282 of FY2023 HOME EN and approximately \$90,000 of Program Income for a total of \$373,282 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.
	<b>Target Date</b>	3/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	6 households assisted
	<b>Location Description</b>	
	<b>Planned Activities</b>	Approximately 6 households will be assisted.
<b>24</b>	<b>Project Name</b>	Tonawanda First-Time Homebuyer Closing Cost Assistance (HOME)
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Promote Affordable Homeownership
	<b>Needs Addressed</b>	Homebuyer Assistance for Affordable Housing
	<b>Funding</b>	HOME: \$20,000
	<b>Description</b>	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 FY2023.
	<b>Target Date</b>	3/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 households assisted.
	<b>Location Description</b>	
	<b>Planned Activities</b>	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.
<b>25</b>	<b>Project Name</b>	Tonawanda HOME Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:

<b>Description</b>	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.
<b>Target Date</b>	3/31/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
<b>Location Description</b>	
<b>Planned Activities</b>	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.

## **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**

<b>Target Area</b>	<b>Percentage of Funds</b>
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 2020. 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.

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

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

<b>One Year Goals for the Number of Households Supported Through</b>	
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

The Town completed an acquisition and rehab of a vacant single-family home on Grover Cleveland Highway, which will be resold to a low-mod household in 2023. In 2022 the town acquired a vacant parcel on Sunset Court to construct a three bedroom home, which will also be sold to an eligible first-time homebuyer. The majority of the housing funds will be used for rehabilitation of income-eligible existing owner-occupied units through a 0% deferred loan program. The program will also assist approximately four first-time income eligible homebuyers with closing cost assistance in the form of a 0% deferred loan. Lastly, a subsidy of \$100,000 will be provided to a non-profit developer to create 1-2 new affordable rental housing within the Town.

### Cheektowaga

The Town has acquired two vacant properties on Gardenvale and Peachrow and are currently constructing single family homes on each parcel to sell to income-eligible first-time homebuyers. These projects shall be 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

Due to the severe need for decent, affordable rental units, the majority of housing funds will be used to subsidize the creation of affordable rental units (likely as part of a school or public facility conversion project). The remaining housing funds will be used for rehabilitation of income-eligible existing owner-occupied units through a 0% deferred loan program as well as 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 Program rounds 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**

Recently, People Inc. responded to an RFP for another HOME Rental Subsidy project called Blocher Homes to be located in the Village of Williamsville. The Town has conducted preliminary underwriting review of this project and awarded a \$300,000 Reservation of Funding towards the project. If successful in receiving the other financing and passing final underwriting, Amherst intends to fund a construction loan for the Blocher Homes Project in PY 2022, utilizing program funds from 2021 and 2022.

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 2023. Tonawanda has also conditionally committed PY21 and PY22 funds for a HOME Rental Subsidy project for PY21 and PY22, which is currently being reviewed by Town staff.

**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. Currently the HOME-ARP Allocation Plan is awaiting approval from HUD before project activities outlined in that plan can begin.

### **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 may be made available to the Amherst Meals on Wheels program to provide healthy nutritious meals to the Town's identified homeless individuals or families if requested. The Town has completed its draft HOME-ARP Allocation Plan for the ACT Consortium and submitted the plan for HUD approval. Any additional homeless programming conducted as part of the HOME-ARP funding will begin upon approval of the plan by HUD. See the HOME-ARP Allocation Plan under the ACT HOME Consortiums 2021 Annual Action Plan for details on the activities proposed.

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.

Amherst's CDBG funding also supports the YWCA housing for families affected by domestic violence. In many instances the clients are coming from a place of homelessness and are referred to the YWCA once assistance limits are up at the HOPE House, a homeless shelter in the East Side of Buffalo. When the YWCA becomes involved, the clients receive more self-sufficiency assistance to be able to sustain themselves and their families over the long-term, than would otherwise be provided through HOPE House.

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 YWCA for four units of Transitional Housing in the Town for families re-establishing themselves after the disruption of domestic violence and homelessness. Funds are used for case management.

### **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.

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, Town staff applied to 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. 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 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 25 single-family units and two two-family unit will be rehabilitated. (Town/Village-wide)

In 2023, the Town of Amherst will build a single-family home at 44 Sunset Court to be resold to a first-time homebuyer. This property will be made affordable to an income-eligible homebuyer below 80% Area Median Income using HOME funds.

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-five (25) 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 will actively participate 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 \$238,782.98. The methodology applied included collecting sales data from each Town Assessor for the months of June, July and August of 2022 for single-family homes (Code 210) with arms-length sales. The number of sales were 808; resulting in the need for three months of sales data for the analysis. The median sale value of the data set is \$251,350.50, that figure multiplied by 95% generates the value limit of \$238,782.98. 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 2022.

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
<b>Total Program Income:</b>	<b>60,000</b>

#### 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(l)(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

2023 goal: low-mod homebuyers assisted: 4 1 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.

## Attachments



**Citizen Participation Comments**

**PUBLIC HEARING  
TOWN OF AMHERST  
FY 2023 ACTION PLAN**

**COMMUNITY DEVELOPMENT BLOCK GRANT  
HOME INVESTMENT PARTNERSHIPS PROGRAM**

A public hearing will be held by the Town of Amherst on October 17, 2022 at 7:00 p.m. at the Amherst Municipal Building, 5583 Main Street, Williamsville, NY 14221. The purpose of the hearing is to solicit the views of citizens, public agencies and other interested parties on possible projects to address housing and community development needs in the Town. A new Annual Action Plan will be drafted for the 2023 program year which begins April 1, 2023.

Approximate funding levels for these programs for Federal FY 2023 are:

Amherst CDBG:	\$ 610,000
HOME Consortium (Amherst-Tonawanda-Cheektowaga)	\$1,000,600

Those not choosing to attend the public hearing may submit comments in writing to the Amherst Planning Department, 5583 Main Street, Williamsville, N.Y. 14221 or to [communitydevelopment@amherst.ny.us](mailto:communitydevelopment@amherst.ny.us). Comments will be received no later than November 18, 2022.

Interpreters are available upon request at the meetings. If you are in need of such special arrangements, please contact the Amherst Planning Department at 631-7082 seven (7) business days in advance of the hearings

Brian J. Kulpa  
Town Supervisor  
Town of Amherst

Publish Display Ad October 5, 2022

**PUBLIC HEARING  
TOWN OF AMHERST  
FY 2023 ACTION PLAN**

**COMMUNITY DEVELOPMENT BLOCK GRANT  
HOME INVESTMENT PARTNERSHIPS PROGRAM**

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Interpreters are available upon request at the meetings. If you are in need of such special arrangements, please contact the Amherst Planning Department at 631-7082 seven (7) business days in advance of the hearings

Brian J. Kulpa  
Town Supervisor  
Town of Amherst

Publish Legal Ad October 5, 2022

# North ties WS West, falls to Clarence

Williamsville North's girls soccer team got off to a rough start in its road game against West Seneca West Sept. 27, but the game ended in a 2-2 tie.

North coach Doug Kircher said West generated most of the offense in the beginning of the game, which caught his team flat-footed. West's first two shots on the net resulted in goals and a quick 2-0 advantage.

Kircher said North tried to regain its composure as they swarmed the ball around and attacked the West end, pinning the home team in its end for long periods of time. North finally broke through late in the half. Kyle Davis sent a pass to Lizzy Schmidt down the left side, and she beat her defender around the corner, dribbled in toward the goal and fired a shot into the far side of the net to cut the deficit to 2-1 at the break.

Kircher said the team attacked the West goal to start the second half, but continued to come up short, as the home team's defense and goalkeeper proved to be very strong.

With time moving under five minutes, the Lady Spartans further increased their pressure, going with three forwards into the attack. They were able to finally break down the wall of West defenders. Savannah Perdomo won the ball, drove

down the right side and sent a hard cross in front of the West goal, where a scramble occurred and Lauren Curdrea took the ball at her feet and drove home the ball into the goal to tie the game with two minutes remaining.

As extra time began, both teams had multiple opportunities to win the game, but fell short as each defense came up with outstanding plays, with Davis, Ella Natta, Ruth Tolera, Ashley Roca, Alex Zymb and Hannah Retzer doing a strong job of breaking up West's numerous attacks, and goalkeeper Brooke Stillman coming up with two outstanding saves to keep the game tied as time ran out.

# East girls cross-country records best times at McQuaid Invite

Saturday's McQuaid Invitational served as homecoming competition for the Williamsville East girls cross-country team, and what a homecoming it was.

All runners posted personal and season bests on the challenging but fast 3-mile course at Geneva Valley Park in Rochester.

Freshman Lily Ascare set the pace for East in 19 minutes, 56 seconds, followed closely by her sister, junior captain Bella Ascare, in 20:08.

Strong performances followed, with freshman Clara Bartholomew in 21:24, junior Peyton Claeser in 22:04, and freshman Macky Burnham in 23:09.

Supporting the Lady Spartans with personal best times were Gabby Ruiz Murriazo in 25:36 and Molly Flanagan in 28:54. East hosted Starpoint in an important league meet. Monday followed by Friday's Town of Amherst Championships at Governor Obeyesekere Golf Course.

# South girls tennis improves to 4-4

The Williamsville South girls tennis team improved to 4-1 in ECIC II play with Friday's 4-1 win over Hamburg after 4-1 losses to potential powers Williamsville East and Clarence. Winners at the Hamburg match included Suzanne Tyson, Ayla Zion and Elizabeth Glazman at singles, and Brennan Fitzpatrick and Brydell Johnson at doubles.

Tyson remained undefeated in division play with two wins but lost to last year's sectional champion Julia Laapro from Clarence in a non-league match.

"Julia is two years older and her game is just a bit more mature and powerful than Suzanne's," South coach Paul Genusso said. "In a couple years, I expect her game to be on the same level." Tyson was also the only winner in the loss to East on Wednesday.

South finishes the team portion of the season this week with league matches versus Amherst and Starpoint. On Friday, South will send Tyson to singles and Zion and Glazman in doubles to the ECIC Tournament. Tyson will look to qualify for sectionals and the state tournament again.

## PUBLIC HEARING TOWN OF AMHERST FY 2023 ACTION PLAN COMMUNITY DEVELOPMENT BLOCK GRANT HOME INVESTMENT PARTNERSHIPS PROGRAM

A public hearing will be held by the Town of Amherst on October 17, 2022 at 7:00 p.m. at the Amherst Municipal Building, 5583 Main Street, Williamsville, NY 14221. The purpose of the hearing is to solicit the views of citizens, public agencies and other interested parties on possible projects to address housing and community development needs in the Town. A new Annual Action Plan will be drafted for the 2023 program year which begins April 1, 2023. Approximate funding levels for these programs for Federal FY 2023 are:

Amherst CDBG: \$ 510,000  
HOME Consortium: \$1,000,000  
(Amherst/Concordia-Cheektowaga)

Those not choosing to attend the public hearing may submit comments in writing to the Amherst Planning Department, 5583 Main Street, Williamsville, NY 14221 or to communitydevelopment@amherst.ny.us. Comments will be received no later than November 18, 2022.

Interpreters are available upon request at the meetings. If you are in need of such special arrangements, please contact the Amherst Planning Department at 716-631-7082 seven (7) business days in advance of the hearings.

Eric L. Kiffin  
Town Supervisor  
Michele Amherst  
Town Clerk

holding the 2008 Bart Nash Gregg Drive Buffalo, NY  
Senior Championship at 14206.

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www.amherstbee.com • Facebook.com/amherstbee • Twitter:AmherstBee

## Public Hearing • Town of Amherst FY 2023 Annual Action Plan Community Development Block Grant & Home Investment Partnerships Program

The second public hearing for the Annual Action Plan covering the fiscal year April 1, 2023 through March 31, 2024 for the Town of Amherst Community Development will be held on January 17, 2023 at 7pm. The location of the public hearing is at the Town Municipal Building, 5589 Main Street, West Amherst, NY 14221. The purpose of the hearing is to solicit the views of citizens, public agencies and other interested parties on housing and community development needs as well as comments on the Draft Annual Action Plan, which is currently available for public review in local libraries, the Town Municipal Building and on the town's website ([www.amherstnyc.org](http://www.amherstnyc.org)). The Annual Action Plan sets goals for addressing housing and community development needs, and delineates federal programs that will be used to meet those goals. The Plan covers federal CDBG and HOME funds that the Town applies for annually. Maximum anticipated funding levels for these programs for FY 2023 are:

CDBG: \$ 610,000  
HOME Consortium: \$ 1,000,600

Interpreters will be available upon request at the meetings to sign for the hearing program. If you are in need of such special arrangements, please contact the Assistant Planning Department at 631-7082, seven (7) business days in advance of the hearing. The hearing location is accessible in persons with disabilities.

Daniel C. Howard, AICP  
Planning Director  
Town of Amherst

... If I had used electricity, it would have cost \$1,283.

✓ Windfalls located east of Lake Erie are shut down due to high winds, and the solar panels are covered with snow. The push for an all-electric future is a fraud, and this storm will end the all-electric pipe dream based on wishful thinking, not facts.

✓ I'm a Bills fan but during the storm, we can't drive on the roads, but somehow the Bills can get to the airport, which is closed, to catch a flight. How are they driving with a driving ban in which we can't drive? They fly into Rochester and return to their homes on roads we can't drive on due to the driving ban. Then, there is a player who drove away with an enormous wall of snow hanging off the back of his truck. What if that fell on another vehicle or person and caused an accident? I'm tired of the us and them.

✓ Words cannot express how grateful our family is for the tireless and heroic efforts of Amherst's emergency services and safety team. Our deepest thanks to Jim Zymarek and his stellar crew. Their humanity and courage were bright, shining beacons of hope in a most perilous time.

✓ I live on a busy street in Amherst. On Monday, my neighbors and I were clearing

### Letters to the Editor

#### New housing

(Continued from page 65)

Dwiza need to realize that our communities are not static objects to be preserved in a museum. They are constantly changing, dynamic entities that must react to the demands of 2023 and beyond. The proposed housing projects are just an example of how we react to these demands. They may seem large, but that is because

... taking photos during a driving ban. You're really have to wonder about adults setting an example.

✓ I would like to give my sincerest thanks to Amherst Supervisor Brian Kulpa, who worked around the clock to aid countless individuals and families during the blizzard. We thank him for his continued commendable service to our community.

✓ To the person who won't stop unless the ads say Christmas and not holiday, check a calendar. Christmas doesn't have a monopoly, patient or anything else on that date. It happens to be this year the last day of Hanukkah, and Hanukkah ran for a week. So, who does the date belong to?

✓ Please show consideration for pedestrians' safety and clear your sidewalks of snow and ice within 24 hours of a snowfall. It is the law in Amherst!

(Editor's note: Call The Bee at 716-632-0390 and record a one-minute comment on our Bee Heard line. Callers do not have to identify themselves and no callers' names will be used. In the interest of fairness and good taste, The Bee will not publish derogatory or insulting comments. All comments are by our readers and are subject to editing.)

#### Kudos to village and town plowing

Without a doubt, the Village of West Amherst, the Village of Public Works and Town of Amherst Highway Department deserve a very robust thank you for a job well done during the Blizzard of 2023. Here's to a Happy New Year and all good things to come in 2023!

Sam Spitzer  
Evans Street, West Amherst



# Community Development Program 2023 Action Plan

## 1<sup>ST</sup> PUBLIC HEARING & REQUESTS FOR FUNDING

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Community Development  
Block Grant (CDBG)

&

HOME Investment  
Partnership Program






## Community Development Program 2023 Action Plan

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### SEEKING REQUESTS FOR FUNDING:

- Must address Housing and Community Development needs in Town
- Eligible Activities under CDBG & HOME Investment Partnerships Funding
- Consistent with Town's 5-Year Consolidated Plan (2020-2024)

**REQUESTS FOR 2023 FUNDING due by  
NOVEMBER 18, 2022**





# Community Development Program 2023 Action Plan

## PRIOR YEAR ALLOCATION

**2022**

Community Development Block Grant

**\$640,103**

Town of Amherst & Village of Williamsville

HOME Investment Partnership Program

**\$941,900**

Towns of Amherst, Tonawanda & Cheektowaga

&

## PAST ACTIVITIES

- Homeowner Rehab 0% Loans
- First-time Homebuyer 0% Closing Cost Assistance Loans
- Boys & Girls Club Afterschool Program
- Senior Van
- ADA Sidewalk Ramps Repair
- Homeowner Weatherization
- Fair Housing & Foreclosure Counseling
- Home Ownership Classes
- Emergency Rental Assistance



# Community Development Program 2023 Action Plan

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## ANTICIPATED ALLOCATION

&

## ACTIVITIES

### **2023**

Community Development Block Grant

**\$610,000**

Town of Amherst & Village of Williamsville

HOME Investment Partnership Program

**\$1,000,600**

Towns of Amherst, Tonawanda & Cheektowaga

2023 Activities to be  
determined... based on  
funding requests &  
consistency with 5-yr plan







## Community Development Program 2023 Action Plan

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### ELIGIBLE ACTIVITIES:

#### Community Development Block Grant (CDBG)

- Housing Rehabilitation & Counseling, including weatherization and lead paint remediation.
- Public Services & Programs for at-risk populations, such as afterschool programs, services for disabled citizens/seniors, and financial counseling.
- Public Infrastructure & Neighborhood Improvements in target areas (LMI Census Tracts).





# Community Development Program 2023 Action Plan

## ELIGIBLE NEIGHBORHOODS:

### Legend

-  Block Groups 35.85% or more LMI
-  Census Tracts
-  Census Block Groups





# Community Development Program 2023 Action Plan

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## ELIGIBLE ACTIVITIES:

### HOME Investment Partnership Program

- Housing Rehabilitation Programs, for homeowners and rental properties.
- Affordable Housing Programs, such as first-time homebuyer closing-cost assistance, purchase subsidies, rental assistance.





## Community Development Program 2023 Action Plan

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### Action Plan Development Schedule:

- Requests for funding sent out/noticed - October 5, 2022
  - First Public Hearing - October 17, 2022
  - Requests for funding due - November 18, 2022
  - Draft Action Plan available for public review - December 14, 2022
-



## Community Development Program 2023 Action Plan

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### Action Plan Development Schedule:

- Citizen comments due - January 17, 2023
- Second Public Hearing held - January 17, 2023
- Town Board Authorization by – Mid February 2023
- Final 2022 Action Plan submitted to HUD February 2023



## Community Development Program 2023 Action Plan

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Submit Comments & Requests for Funding to:

**Town of Amherst Planning Department  
Community Development  
5583 Main Street  
Williamsville, NY 14221**

**Contact:**

**James Quinn**

[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)

or (716) 631-7050

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**Amherst Town Board**  
5583 Main Street  
Williamsville, NY 14221  
www.amherst.ny.us

Francina J. Spoth  
Town Clerk

Meeting: 10/17/22 07:00 PM  
Department: Town Clerk  
Initiated by: **Timothy Koller**  
Co-Sponsored by:

DOC ID: 26585

**RESOLUTION 2022-1000**

**HEARING CLOSED**

## **1st Public Hearing & Request for Funding of the 2023 Community Development Program Annual Action Plan**

1st public hearing for the Funding of the 2023 Community Development Program Annual Action Plan.

### **10/17/2022**

A motion to open the public hearing was made by Supervisor Kulpa, seconded by Deputy Supervisor Berger and unanimously approved 5-0. The public hearing was opened at 7:44 PM.

James Quinn, Assistant Planner, presented.

There were no speakers from the public, therefore Supervisor Kulpa moved to close the hearing, seconded by Deputy Supervisor Berger and unanimously approved 5-0. The public hearing was closed at 7:51 PM.

**RESULT: HEARING CLOSED**





Public Hearing  
**Town of Amherst**  
FY 2023 *Annual Action Plan*

Community Development Block Grant &  
Home Investment Partnerships Program

The second public hearing for the *Annual Action Plan* covering the fiscal year April 1, 2023 through March 31, 2024 for the Town of Amherst Community Development will be held on January 17, 2023 at 7pm. The location of the public hearing is at the Town Municipal Building, 5583 Main Street, Williamsville, NY 14221. The purpose of the hearing is to solicit the views of citizens, public agencies and other interested parties on housing and community development needs, as well as comments on the *Draft Annual Action Plan*, which is currently available for public review in local libraries, the Town Municipal Building and on the Town's website ([www.amherst.ny.us](http://www.amherst.ny.us)).

The *Annual Action Plan* sets goals for addressing housing and community development needs, and delineates federal programs that will be used to meet those goals. The Plan covers federal CDBG and HOME funds that the Town applies for annually.

Maximum anticipated funding levels for these programs for FY 2023 are:

CDBG:	\$ 610,000
HOME Consortium (3 towns):	\$ 1,000,600

Interpreters will be available upon request at the meetings to sign for the hearing impaired. If you are in need of such special arrangements, please contact the Amherst Planning Department at 631-7082, seven (7) business days in advance of the hearing. The hearing location is accessible to persons with disabilities.

Daniel C. Howard, AICP  
Planning Director  
Town of Amherst

Display Ad to be published 12/28/22

X:\Community Development\New Structure\ANNUAL PLAN\Data 2023\Public Hearings\2nd PH display ad 01.17.23.docx

Public Hearing  
**Town of Amherst**  
FY 2023 *Annual Action Plan*

Community Development Block Grant &  
Home Investment Partnerships Program

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Daniel C. Howard, AICP  
Planning Director  
Town of Amherst

Legal Ad to be published 1/4/23

X:\Community Development\New Structure\ANNUAL PLAN\Data 2023\Public Hearings\2nd PH display ad 01.17.23.docx



## Community Development Program

### 2<sup>ND</sup> PUBLIC HEARING 2023 DRAFT ACTION PLAN

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Community Development  
Block Grant (CDBG)

&

HOME Investment  
Partnership Program

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## Community Development Program 2023 Action Plan

---

### FUNDING REQUIREMENTS:

- Must address Housing and Community Development needs in Town
  - Eligible Activities under CDBG & HOME Investment Partnership Funding
  - Consistent with Town's Five Year Consolidated Plan (2020-2024)
  - Certain CDBG activities must occur in qualifying census tracts & assist targeted neighborhoods
-

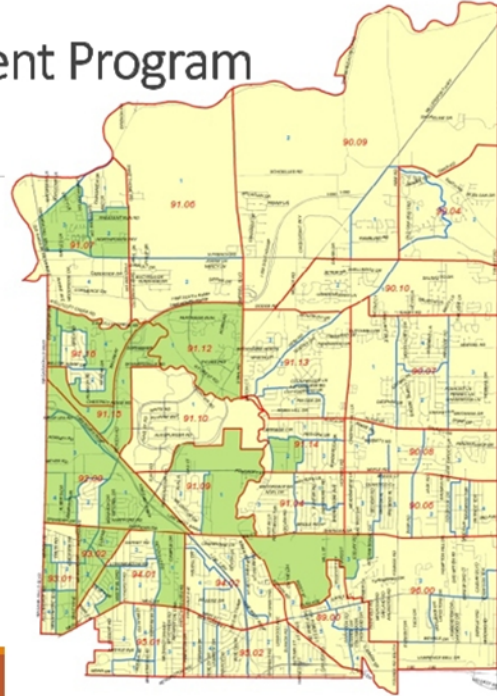


# Community Development Program 2023 Action Plan

## ELIGIBLE NEIGHBORHOODS:

### Legend

- Block Groups 35.85% or more LMI
- Census Tracts
- Census Block Groups



# Community Development Program 2023 Action Plan

## ANTICIPATED ALLOCATION & PROGRAM INCOME

### Community Development Block Grant

**\$610,000**

Town of Amherst & Village of Williamsville

### Community Development Block Grant

**Approx. \$80,000**

Town of Amherst

### HOME Investment Partnership Program

**\$1,000,600**

Towns of Amherst, Tonawanda & Cheektowaga

### HOME Investment Partnership Program

**Approx. \$300,000**

Towns of Amherst, Tonawanda & Cheektowaga



# Community Development Program 2023 Action Plan

## CDBG Allocation

Village of Williamsville (7%)	\$42,700
Housing Rehabilitation*	\$319,100
Public Services (15% cap)	\$103,000
Public Facilities	\$39,000
Admin (20% cap)*	\$106,200
<b>TOTAL</b>	<b>\$610,000</b>

\*Program Income will also be applied

▪ Homeowner Rehab 0% Loans	\$301,100
▪ Lead Paint Testing	\$8,000
▪ Fair Housing Assistance	\$8,000
▪ Weatherization Services	\$10,000
▪ Foreclosure & Housing Counseling	\$22,500
▪ Family Justice Center	\$10,000
▪ Meals on Wheels	\$40,000
▪ YWCA Assistance for At-risk Women	\$30,500
▪ Public Infrastructure	\$39,000



# Community Development Program 2023 Action Plan

## HOME Allocation

10% Administration	\$100,060
Housing Rehabilitation*	\$200,180
Acquisition/Rehab/Resale**	\$0
Home Rental Subsidy	\$100,000
1 <sup>st</sup> Time Homebuyer**	\$0
<b>Amherst TOTAL</b>	<b>\$300,180</b>

\*Program income will be applied

\*\*Prior years funding will be utilized

▪ Homeowner Rehab 0% Loans**	\$200,180
▪ Acquisition/Rehab or Construction/Resale	\$0
▪ HOME Rental Subsidy	\$100,000
▪ Closing-cost Assistance**	\$0



## Community Development Program 2023 Action Plan

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### PUBLIC INPUT:

- 1<sup>ST</sup> Public Hearing held in October 17, 2022
- 1<sup>st</sup> Month-long public comment period ended November 18, 2022
- One public comment was received during the comment period
- Draft Action Plan released for public comment - December 14, 2022
- 2<sup>nd</sup> Month-long public comment period ends today, January 17, 2023
- No written public comments were received
- Final Public Hearing to request public comment on Draft Action Plan



## Community Development Program 2023 Action Plan

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### Next Steps:

- Address any Public Comments raised today in Draft Action Plan
- Submit Final 2023 Action Plan for Town Board Approval on February 13th
- Submit to HUD for Approval end of February 2023



# Community Development Program 2023 Action Plan

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## Questions/Comments?

**Town of Amherst Planning Department  
Community Development  
5583 Main Street  
Williamsville, NY 14221**

Contact: James Quinn at [jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)  
or (716) 631-7050





**Amherst Town Board**  
5583 Main Street  
Williamsville, NY 14221  
www.amherst.ny.us

Francina J. Spoth  
Town Clerk

Meeting: 01/17/23 07:00 PM  
Department: Town Clerk  
Initiated by: **Timothy Koller**  
Co-Sponsored by:

DOC ID: 26970

**RESOLUTION 2023-74**

**HEARING CLOSED**

## **The Second of Two Public Hearings Required by the U.S. Department of Housing and Urban Development for the FY 2023 Community Development Action Plan**

The second Public Hearing for the FY2023 Community Development Action Plan.

### **1/17/2023**

A motion to open the public hearing was made by Supervisor Kulpa, seconded by Deputy Supervisor Bucki and unanimously approved 5-0. The public hearing was opened at 7:13 PM.

James Quinn, Assistant Planner, presented.

There were no speakers from the public, therefore Supervisor Kulpa moved to close the hearing, seconded by Deputy Supervisor Bucki and unanimously approved 5-0. The public hearing was closed at 7:19 PM.

**RESULT: HEARING CLOSED**



**Quinn, James**

---

**From:** Gregory Dionne <gregory.m.dionne@gmail.com>  
**Sent:** Wednesday, October 19, 2022 12:56 PM  
**To:** Quinn, James  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization.  
Please do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, that sounds good! Thank you, James! Looking forward to hearing what you find out.

On Wed, Oct 19, 2022 at 11:53 AM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Thank you Greg!

I really like these ideas and they certainly fall under pedestrian amenities improvements. I believe these ideas would be a great use of funds and should qualify, but I need to check for rules and regulations that might affect these ideas if implemented. I will need to do some fact finding on the feasibility and look into any potential road blocks these projects might encounter.

Would it be okay to reach out to you with follow up questions in the near future once I find out more?

*Regards,*

*James Quinn*

*Assistant Planner*

*Town of Amherst*

*Planning Department*

*[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)*

*716-631-7104*

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Tuesday, October 18, 2022 5:08 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

**CAUTION:** This email originated from outside of the organization.  
Please do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you, James!

This is a very interesting program. You had mentioned in your presentation that the CDBG funds could potentially be used for "pedestrian amenities, park improvements, and community center improvements".

I have three ideas for possible uses that I think would be beneficial to the Eggertsville area, and I believe all three ideas fall within the green census tracts that you mentioned they need to be in to be eligible:

- A bike rack for ECO Park on Crosby Boulevard (This is a very popular place in our neighborhood so having a place to park bikes would be very helpful)
- Seating/benches at the bus stops at Maynard Drive and Grover Cleveland Highway (Between the #44 and UB Stampede bus routes, this is actually the busiest bus route in the entire town, with roughly 350 buses passing by on peak days. There are often many students waiting for the buses at these 2 bus stops so a bench would be very beneficial for a large number of people)
- Seating/benches at the bus stops at Main Street and Eggert Road. (The #47 and #48 bus routes pass through this intersection and are some of the busier bus routes that run through the town. There are often people waiting for buses here, including myself, who would benefit from a place to sit and wait comfortably)

What are your thoughts on these ideas? Do any of them seem like they would be feasible to use 2023 CDBG funds on?

Thank you very much in advance for your time and consideration!

Sincerely,

Greg

2

On Tue, Oct 18, 2022 at 4:31 PM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Hi Greg,

Please see attached for a copy of the presentation on our request for funding and public comment on the 2023 Annual Action Plan of CDBG and HOME Investment Partnership funding. If you have any questions or comments, feel free to contact me directly by email or at my direct line below.

*Regards,*

*James Quinn*

*Assistant Planner*

*Town of Amherst*

*Planning Department*

*[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)*

*716-631-7104*

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Tuesday, October 18, 2022 2:40 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Community Development Action Plan - 2023 CDBG

**CAUTION:** This email originated from outside of the organization.  
Please do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi James,

My name is Greg Dionne. I live at 1422 Eggert Road in Amherst and also serve as the Vice-Chairman of the Amherst Traffic Safety Board.

Would you be able to provide me with a copy of your presentation you gave in yesterday's Town Board meeting?

Thank you!

Greg Dionne

**Quinn, James**

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**From:** Quinn, James  
**Sent:** Thursday, January 19, 2023 10:49 AM  
**To:** 'Gregory Dionne'  
**Subject:** RE: Community Development Action Plan - 2023 CDBG  
**Attachments:** 2022 Bike Rack Location.JPG

Hi Greg,

Questions are always welcome!

Attached is the rough location for a new bike rack that I sent to Youth and Recreation department. Of course, it is not a formal plan, but was developed by our Landscape Architect who would help determine the proper placement anyway. As for any documents regarding the redevelopment, I am not aware of any at this time. However, it may be worth checking in with the Executive Director of Youth and Recreation Department about it. Her contact information is below:

Pouli, Mary-Diana  
Executive Director  
631-7132 ext. 7532  
[mpouli@amherst.ny.us](mailto:mpouli@amherst.ny.us)

Hopefully this helps and I have your comments on record so I will be having my eye on them and looking for opportunities in the future to implement them. If you have any other questions or new ideas for public infrastructure, feel free to contact me or visit me in Town Hall.

*Regards,*  
*James Quinn*  
*Assistant Planner*  
*Town of Amherst*  
*Planning Department*  
[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)  
716-631-7104

---

**From:** Gregory Dionne <gregory.m.dionne@gmail.com>  
**Sent:** Wednesday, January 18, 2023 5:23 PM  
**To:** Quinn, James <jquinn@amherst.ny.us>  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

**CAUTION:** This email originated from outside of the organization.  
Please do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi James,

I hope 2023 is off to a good start for you!

1

Thank you very much for following up with me regarding this matter. I had a hunch that the jurisdiction of those streets would be a factor. Hopefully, NYSDOT and NFTA are able to make something happen someday.

Two questions regarding ECO Park, if I may:

- 1) Where did you and the landscape architect determine the bike rack could/would go?
- 2) Do you have any other information, links, documents, etc. related to that planned redevelopment/rehab of the park?

I'm just curious as that park was built in 2018, so I'm surprised to hear that any major changes are being considered at this time.

Thank you!  
Greg

On Tue, Jan 17, 2023 at 10:21 AM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Hi Greg,

I wanted to reach out and give you a status update on your requests during the first round of public comment of the 2023 Annual Action Plan for the CDBG and HOME programs. Below are of course, your comments that I received and beneath them in blue is respectively the final response we have for each. While I can't formally address them in this year's allocation plan, I have brought them to the attention of the agencies who might better be able to incorporate them into their future plans.

- A bike rack for ECO Park on Crosby Boulevard (This is a very popular place in our neighborhood so having a place to park bikes would be very helpful)

I spoke with the Executive Director of the Town of Amherst Youth, Parks, and Recreation Dept and was informed that there is a pending redevelopment plan being drafted to upgrade and rehab Eco Park. I spoke with our Landscape Architect and developed a potential location for a bike rack to be considered in this future plan and forwarded this on to the Executive Director of Youth, Parks, and Recreation.

- Seating/benches at the bus stops at Maynard Drive and Grover Cleveland Highway (Between the #44 and UB Stampede bus routes, this is actually the busiest bus route in the entire town, with roughly 350 buses passing by on peak days. There are often many students waiting for the buses at these 2 bus stops so a bench would be very beneficial for a large number of people)

This project involves the approval and the jurisdiction of the NYS DOT. The project has been forwarded to them for review and consideration.

- Seating/benches at the bus stops at Main Street and Eggert Road. (The #47 and #48 bus routes pass through this intersection and are some of the busier bus routes that run through the town. There often people waiting for buses here, including myself, who would benefit from a place to sit and wait comfortably)

This project involves the approval and the jurisdiction of the NFTA. The project has been forwarded to them for review and consideration.

While unfortunately I could not find a funding area to execute these projects at the moment and it can be a challenge in overlapping jurisdictional areas. I will do everything I can to not only push for these projects but to also keep you informed if any of them should be approved in the future. Tonight, I am going to be presenting the draft 2023 Annual Action Plan for CDBG and HOME at the Town Board meeting. I will speaking briefly to what you submitted and our formal response to them as described above. Please continue to provide your input and good ideas for future consideration. I appreciate it and look forward to hopefully hearing more from you soon.

*Regards,*

*James Quinn*

*Assistant Planner*

*Town of Amherst*

*Planning Department*

[\*jquinn@amherst.ny.us\*](mailto:jquinn@amherst.ny.us)

*716-631-7104*

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Wednesday, November 16, 2022 2:43 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

**CAUTION:** This email originated from outside of the organization.  
Please do not click links or open attachments unless you recognize the sender and know the content is safe.

Sounds good, James! I figured you were on top of it, but wanted to check in just in case.

I know exactly which house on GCH you're talking about. It came out great. Nice work by you and all involved. I'm happy it gave you a chance to see how busy that bus stop is in-person.

Thanks again!

3

On Wed, Nov 16, 2022 at 1:36 PM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Hi Greg!

I am compiling requests up to the 18<sup>th</sup> and will have a better idea of the allocation amount I will have available after that. I have included your input into our file and need to look more into the costs of benches and the bike rack you suggested. I still really like your ideas and concur especially on the Maynard and Grover Cleveland Hwy bus stop. We rehabbed a house recently not far from that stop and witnessed the massive student congregations during the day for ourselves.

My short answer is I should know more in December as our budget gets finalized, but I am actively looking into some specifics in regards to your input to see how and if they can be included in the Annual Action Plan. I will definitely give you a status update around that time.

Thanks again for your excellent input!

*Regards,*

*James Quinn*

*Assistant Planner*

*Town of Amherst*

*Planning Department*

*[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)*

*716-631-7104*

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Wednesday, November 16, 2022 1:15 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

4



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Hi James,

I hope you are doing well.

I just wanted to check with you and see if there were any updates or new information on this.

Thank you!

Greg

On Wed, Oct 19, 2022 at 12:55 PM Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)> wrote:

Yes, that sounds good! Thank you, James! Looking forward to hearing what you find out.

On Wed, Oct 19, 2022 at 11:53 AM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Thank you Greg!

I really like these ideas and they certainly fall under pedestrian amenities improvements. I believe these ideas would be a great use of funds and should qualify, but I need to check for rules and regulations that might affect these ideas if implemented. I will need to do some fact finding on the feasibility and look into any potential road blocks these projects might encounter.

Would it be okay to reach out to you with follow up questions in the near future once I find out more?

*Regards,*

*James Quinn*

*Assistant Planner*  
*Town of Amherst*  
*Planning Department*  
[Jquinn@amherst.ny.us](mailto:Jquinn@amherst.ny.us)  
716-631-7104

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Tuesday, October 18, 2022 5:08 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Re: Community Development Action Plan - 2023 CDBG

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Thank you, James!

This is a very interesting program. You had mentioned in your presentation that the CDBG funds could potentially be used for "pedestrian amenities, park improvements, and community center improvements".

I have three ideas for possible uses that I think would be beneficial to the Eggertsville area, and I believe all three idea fall within the green census tracts that you mentioned they need to be in to be eligible:

- A bike rack for ECO Park on Crosby Boulevard (This is a very popular place in our neighborhood so having a place to park bikes would be very helpful)
- Seating/benches at the bus stops at Maynard Drive and Grover Cleveland Highway (Between the #44 and UB Stampede bus routes, this is actually the busiest bus route in the entire town, with roughly 350 buses passing by on peak days. There are often many students waiting for the buses at these 2 bus stops so a bench would be very beneficial for a large number of people)
- Seating/benches at the bus stops at Main Street and Eggert Road. (The #47 and #48 bus routes pass through this intersection and are some of the busier bus routes that run through the town. There often people waiting for buses here, including myself, who would benefit from a place to sit and wait comfortably)

What are your thoughts on these ideas? Do any of them seem like they would be feasible to use 2023 CDBG funds on?

Thank you very much in advance for your time and consideration!

Sincerely,

Greg

On Tue, Oct 18, 2022 at 4:31 PM Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)> wrote:

Hi Greg,

Please see attached for a copy of the presentation on our request for funding and public comment on the 2023 Annual Action Plan of CDBG and HOME Investment Partnership funding. If you have any questions or comments, feel free to contact me directly by email or at my direct line below.

*Regards,*

*James Quinn*

*Assistant Planner*

*Town of Amherst*

*Planning Department*

[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)

*716-631-7104*

7

---

**From:** Gregory Dionne <[gregory.m.dionne@gmail.com](mailto:gregory.m.dionne@gmail.com)>  
**Sent:** Tuesday, October 18, 2022 2:40 PM  
**To:** Quinn, James <[jquinn@amherst.ny.us](mailto:jquinn@amherst.ny.us)>  
**Subject:** Community Development Action Plan - 2023 CDBG

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Hi James,

My name is Greg Dionne. I live at 1422 Eggert Road in Amherst and also serve as the Vice-Chairman of the Amherst Traffic Safety Board.

Would you be able to provide me with a copy of your presentation you gave in yesterday's Town Board meeting?

Thank you!

Greg Dionne

Grantee SF-424's and Certification(s)

OMB Number 4340-0004  
 Expired Date 10-31-2022

Application for Federal Assistance SF-424		
<b>*1. Type of Submission</b> <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Correcting Application		
<b>*2. Type of Application</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate title(s)</b> _____ <b>* Other (Specify):</b> _____		
<b>*3. Date Received:</b> 08/19/21		<b>4. Applicant Identifier</b> 82302160010
<b>5a. Federal Entity Identifier:</b> _____		<b>5b. Federal Award Identifier:</b> _____
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> _____		<b>7. State Application Identifier:</b> _____
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Town of Arden		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 14-000-215		<b>* c. UEI:</b> 000000000000000000
<b>d. Address:</b>		
<b>* Street:</b> 600 Main Street		
<b>* City:</b> Millersville		
<b>* State:</b> NY: New York		
<b>* County:</b> USA: US150: Seneca		
<b>* Zip Postal Code:</b> 14921: 5485		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Planning Department		<b>Division Name:</b> Community Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Ms. <b>* First Name:</b> Laurie		
<b>Middle Name:</b> _____		
<b>* Last Name:</b> Stillwell		
<b>Suffix:</b> _____		
<b>Title:</b> Community Development Director		
<b>Organizational Affiliation:</b> _____		
<b>* Telephone Number:</b> (716) 631-7656		<b>* Fax Number:</b> _____
<b>* E-mail:</b> lstillwell@ardenst.ny.us		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text"/>	
<b>CFDA Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="14.216 - Affordable Credit"/>	
<b>* Title:</b> <input type="text" value="Town of Auburn and Village of Wilkesville"/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="CDBG Project Title: Single Family Owner Occupied Housing Rehabilitation; Public Reserved for Low Income Families and Youth; Weatherization Services; Historic Preservation."/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: NY026	* b. Program/Project: NY026
Attach an excel or list of Program/Project Congressional Districts if needed.	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 04/01/2022	* b. End Date: 03/31/2023
18. Estimated Funding (\$):	
* a. Federal: 929,897.00	
* b. Applicant:	
* c. State:	
* d. Local:	
* e. Other:	
* f. Program Income: 92,920.00	
* g. TOTAL: 1,022,817.00	
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on:	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: Mr.	* First Name: Brian
Middle Name:	
* Last Name: Seltzer	
Suffix:	
* Title: Town of Aurora, Supervisor	
* Telephone Number: (716) 621-7032	Fax Number:
* Email: b.seltzer@townofaurora.ny.us	
* Signature of Authorized Representative:	* Date Signed: 5/19/22





Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Continued Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate title(s): _____ * Other (Specify): _____
* 3. Date Received: 09/10/2023	4. Applicant Identifier: M2J00368J21	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: Town of Asherast		
* b. Employer/Agency Identification Number (EIN/TIN): 10-600-2117	* c. UFI: EDV/COR/DOR	
d. Address:		
* Street1: 2513 Main Street	Street2: _____	
* City: Millersville	County/Parish: _____	
* State: NY; New York	Province: _____	
* Country: USA; UNITED STATES	* Zip/Postal Code: 14521-5468	
e. Organizational Unit:		
Department Name: Planning Department	Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: Mr.	* First Name: Joseph	* Last Name: Stillwell
* Middle Name: _____	* Last Name: Stillwell	* Suffix: _____
Title: Community Development Director		
Organizational Address: _____		
* Telephone Number: (716) 631-7008	* Fax Number: _____	
* Email: jstillwell@asherast.ny.us		

Application for Federal Assistance SF-424	
<p>* 8. Type of Applicant 1: Select Applicant Type:</p> <p>0: City or Township Government</p> <p>Type of Applicant 2: Select Applicant Type:</p> <p>Type of Applicant 3: Select Applicant Type:</p> <p>* Other (specify):</p>	
<p>* 10. Name of Federal Agency:</p> <p>U.S. Department of Housing and Urban Development</p>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p>CFDA Title:</p>	
<p>* 12. Funding Opportunity Number:</p> <p>14.239 BOND</p> <p>Title:</p> <p>Town of Ansonia, Village of Millbrook, Town of Cheshire, Villages of Sloan &amp; Dorset, Town of Wallingford, and Village of Ferris.</p>	
<p>13. Competition Identification Number:</p> <p>Title:</p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p><input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <p>BOND Project: Pillbox Single Family Home Sampled Housing Rehabilitation, First-Time Homebuyer Assistance, Acquisition-Rehabilitation/Construction Incentive of New Housing, New Rural Development Subsidy.</p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></p>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: NY 26	* a. Program/Project: NY 26
Attach an additional list of Program/Project Congressional Districts if needed	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 04/01/2022	* b. End Date: 03/31/2623
18. Estimated Funding (\$):	
* a. Federal	1,000,000.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	300,000.00
* g. TOTAL	1,300,000.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: Mr.	* First Name: Brian
Middle Name:	
* Last Name: Ruciga	
Suffix:	
* Title: Town of Auburn Supervisor	
* Telephone Number: 202-634-1000	* Fax Number:
* Email: brian@auburnny.us	
* Signature of Authorized Representative:	* Date Signed: 5/19/23



ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number 4140-0006  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (C348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not disclose, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900-Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255) as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-516), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1972 (42 U.S.C. §§290 dd, 3 and 290 ee, 3) as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-150) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11588; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470); EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133 "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Dean of Ashland Supervised
APPLICANT ORGANIZATION	DATE SUBMITTED
Ashland-Coelebrating Tomorrow's #003 Consortium	5/29/23

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ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0036  
 Expiration Date: 02/28/2025

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**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutions, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not disclose or, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470; EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
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19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 103(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Town of Amherst Supervisor
APPLICANT ORGANIZATION	DATE SUBMITTED
Town of Amherst	5/19/23

SF-424D (Rev. 7-87) Deck



## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.


**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature of Authorized Official

5/19/23  
\_\_\_\_\_  
Date

Town Supervisor  
\_\_\_\_\_  
Title

**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title

**Discharge Policy** The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

OSK  
Signature of Authorized Official

5/19/23  
Date

Town Supervisor  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

5/19/23  
\_\_\_\_\_  
Date

Town Supervisor  
\_\_\_\_\_  
Title

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

5/19/23  
\_\_\_\_\_  
Date

Town Supervisor  
\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.





**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 75.

  
\_\_\_\_\_  
Signature of Authorized Official

5/19/23  
\_\_\_\_\_  
Date

Brian Kulpa - Town Supervisor  
\_\_\_\_\_  
Title

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) \_\_\_\_\_ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

HOME-ARP

HOME INVESTMENT PARTNERSHIPS  
PROGRAM

**HOME-ARP**

**ALLOCATION PLAN**

FOR THE  
SPECIAL APPROPRIATION OF THE AMERICAN RESCUE PLAN ACT

Towns of Amherst, Cheektowaga & Tonawanda, NY  
ACT HOME Consortium

September 29, 2022

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## Introduction

On March 11, 2021, President Biden signed into law The American Rescue Plan Act of 2021. The Act provides a special \$5 Billion appropriation of U.S. Department of Housing and Urban Development's HOME Investment Partnership Program (HOME) funds to alleviate homelessness and unstable housing situations in the wake of the COVID-19 Pandemic.

The Towns of Amherst, Cheektowaga and Tonawanda regularly receive HOME entitlement funds as part of their HOME Consortium. With the passage of the American Rescue Plan (ARP), the Amherst, Cheektowaga, Tonawanda (ACT) HOME Consortium will receive a special **\$3,413,700** appropriation of HOME-ARP funds for these purposes.

To alleviate homelessness, the special HOME-ARP funding has a narrower beneficiary focus than traditional HOME funding. HOME-ARP funded activities must benefit specific qualifying populations including individuals and families who are homeless; at-risk of homelessness; or in other vulnerable populations or situations. Specific definitions of the HOME-ARP Qualifying Populations as provided in the HUD CPD Notice 21-10 that can be found in Appendix A. Eligible HOME-ARP activities allow for the development and support of affordable housing; tenant-based rental assistance; provisions for supportive services; and acquisition and development of non-congregate shelter units.

HUD's CPD Notice 21-10 requires the ACT HOME Consortium to evaluate homelessness conditions in our communities and outline an Allocation Plan for the expenditure of HOME-ARP funds, which must be approved by HUD. Development of the Allocation Plan must include consultations with community partners, a Needs and Gap Analysis, and a public participation process. This Allocation Plan outlines the steps undertaken by the ACT HOME Consortium to draft this plan, as well as the programming options and special population preferences chosen for the expenditure of HOME-ARP funds.

## Consultation

### Process

#### ***Describe the consultation process:***

The ACT HOME Consortium undertook community consultation with three main outreach methods: Stakeholder Introduction Meetings; One-on-One Stakeholder/Service Provider Meetings; and Service/Facility Provider Surveys. Stakeholders consulted consisted of the local Continuum of Care (CoC), Public Housing Authorities; regional service providers, housing/support program facility operators, non-profits, public entities, and other community partners whose primary missions or programming includes assisting homeless populations; assisting populations commonly at-risk for homelessness; and alleviating housing instability conditions.

Beginning in March 2022, three (3) Stakeholder Introductory Meetings were held to kick-off the Allocation Plan planning process by outlining the special funding and qualifying populations and what the Consortium was tasked to do. Following an overview of the main HOME-ARP considerations from the CPD-Notice 21-10, participants also participated in a group discussion of the needs and gaps as they see them within the current homeless assistance system. The Introductory meetings were held in Partnership with Erie County, who also received HOME-ARP funding, and Stakeholders were given the choice of one of the three to attend. A list of participants is provided in Table 1 below and a summary of

the comments and conclusions from these discussions are presented in the Consultation Summary & Findings section beginning on page 7.

**TABLE 1. STAKEHOLDER INTRODUCTORY MEETING ATTENDEES**

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Service Summary</b>
<b>Belmont Housing Resource of WNY, Inc.</b>	Public Housing Authority Admin; Non-profit Affordable Housing Development	Virtual Meeting 3/17/2022 3/24/2022 3/31/2022	Affordable housing development, housing counseling, and rental voucher administrators
<b>Erie County Department of Mental Health</b>	Local Government Unit, Disability	Virtual Meeting 3/24/2022	Supportive services, counseling, prevention programs, Re-entry services, Single-point-of Access Provider.
<b>Erie County Department of Social Services</b>	Local Government Unit & Homeless Service Provider	Virtual Meeting 3/17/2022 3/24/2022 3/31/2022	Case management and rapid re-housing of homeless individuals and families in Erie County
<b>Family Promise</b>	Non-profit Service Provider, Shelter	Virtual Meeting 3/24/2022	Shelter operator, supportive services, housing search assistance.
<b>Haven House – Department of Child and Family Services</b>	Local Government Unit - Shelter	Virtual Meeting 3/24/2022 3/31/2022	Legal/ social service provider, domestic violence shelter operator
<b>Homeless Alliance of Western New York</b>	CoC Lead/ HMIS	Virtual Meeting 3/25/2022	CoC lead agency and manager of Homeless Management Information System
<b>Legal Aid Bureau of Buffalo</b>	Non-profit Legal Service Organization	Virtual Meeting 3/17/2022	Provides legal service and representation to vulnerable individuals
<b>Housing Opportunities Made Equal</b>	Non-profit Fair Housing Advocacy	Virtual Meeting 3/24/2022	Legal service provider, fair housing counseling
<b>People Inc.</b>	Non-profit service provider	Virtual Meeting 3/31/2022	Intellectual Disability Service Provider, Housing Developer
<b>Rental Assistance Corporation (RAC)</b>	Public Housing Authority	Virtual Meeting 3/24/2022	Housing Choice Vouchers, housing counseling provider

<b>Restoration Society Inc.</b>	Non-profit Recovery-based mental health services	Virtual Meeting 3/24/2022	Substance abuse and mental health supportive services
<b>Tonawanda Housing Authority</b>	Public Housing Authority	Virtual Meeting 3/24/2022	Public housing provider
<b>Salvation Army Adult Rehabilitation Center</b>	Non-profit Housing and Human Service Provider	Virtual Meetings 3/24/2022 & 3/31/2022	Case management, substance abuse counseling, and rapid rehousing provider
<b>Veterans One-stop Center of WNY</b>	Non-profit Veterans Services	Virtual Meeting 3/31/2022	Service and resource provider for veterans
<b>Western New York Veterans Housing Corporation (WNYVHC)</b>	Non-profit Veterans Org	Virtual Meeting 3/31/2022	Veterans-specific housing provider
<b>Developmental Disabilities of WNY</b>	Non-profit disability service provider	Virtual Meeting 3/31/2022	Affordable Housing Developer
<b>WNY Independent Living</b>	Disabilities Services and Advocacy	Virtual Meeting 3/31/2022	Service and resource provider for disabled individuals and families
<b>211 WNY</b>	Informational Hotline, referral service	Virtual Meeting 3/24/2022	Housing and human services hotline

Following the initial Introduction Meetings, ACT HOME Consortium staff held several one-on-one meetings with various stakeholders and service providers. The purposes of the one-on-one meetings were to have a more private conversation about the state/effectiveness of the homeless assistance systems in Western New York and the additional factors to consider that may be contributing to the needs and gaps as brought up previously. Also, the one-on-one meetings provided an opportunity to speak candidly with regional non-profits to understand their long-term goals as an organization to serve the qualifying populations better and what eligible HOME-ARP programming structures would make the most sense from their perspective. These sessions were also used to better gauge capacity-building support needs in order to make programming successful. In this regard, the one-on-one meetings proved helpful to refining the Consortium's HOME-ARP program allocation categories.

For privacy purposes the conclusions of these meetings are summarized in the Consultation Summary & Findings section. Table 2 lists the organizations and entities that received one-on-one Meetings with ACT HOME Consortium Staff.

**TABLE 2. ONE-ON-ONE CONSULTATION MEETINGS**

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Services Summary</b>
<b>Amherst Senior Outreach</b>	Local government division	Virtual Meeting 4/20/2022	Provides programing and counseling for Seniors in the Town of Amherst
<b>Buffalo Urban League</b>	Housing and human service coordinator	Virtual Meeting 4/7/2022	Provides individual counseling to people in need of housing, education, and employment
<b>Cheektowaga Senior Services</b>	Local government division	Meeting 5/5/2022	Provides programing and counseling for Seniors in the Town of Cheektowaga
<b>Cheektowaga Youth &amp; Recreation</b>	Local government division	Meeting 5/2/2022	Provides youth programing in the Town of Cheektowaga
<b>Family Justice Center</b>	Non-profit Domestic Violence Service Provider	Virtual Meeting 4/20/2022	Provides counseling, legal services, and housing coordination for individuals of domestic violence
<b>Matt Urban Center</b>	Housing and community service provider	Virtual Meeting 4/22/2022	Coordinates human and housing placement services for individuals and families
<b>People Inc.</b>	Non-profit service provider	Virtual Meeting 4/27/2022	Intellectual Disability Service Provider, Housing Developer
<b>Police Departments: Amherst/Cheektowaga/Tonawanda</b>	Municipal Law Enforcement	In Person interview 6/5/2022 5/3/2022	Community policing
<b>School Districts: Sweet Home Williamsville Amherst Maryvale</b>	NYS education administrators	Virtual Meeting 4/8/2022 4/21/2022 5/17/2022	McKinney Vento Act participants, case work for children of housing insecure families
<b>Town of Amherst Disabilities Committee</b>	Local Government Committee	Virtual Meeting 4/4/2022	Disabilities advocate for the Town of Amherst



<b>University District Community Development Agency</b>	Community development, human services, and affordable housing provider	Virtual Meeting 4/22/2022	Coordinates housing programs and community projects focused on youth and seniors in the University District of Buffalo NY
<b>Village of Depew</b>	Municipality	Meeting 5/6/2022	Government operations
<b>Village of Sloan</b>	Municipality	Meeting 5/4/2022	Government operations
<b>WNY Independent Living</b>	Disabilities advocacy and service provider	Meeting 4/8/2022	Provides counseling and care coordination for individuals with disabilities
<b>Y.W.C.A. WNY</b>	Social and housing service provider	Virtual Meeting 4/22/2022	Coordinates social services and housing placements for women and children

Lastly, the ACT HOME Consortium put out a Survey directed to service and facility providers to further understand needs and gaps in the system as they see them, and to rank the issues raised in terms of preferences for the funding allocations. Table 3. below outlines all the entities that responded to the Survey. A summary of the Survey's main findings are provided on page 10 and 11. A full copy of the Survey results are included in Appendix B.

**TABLE 3. Service and Facility Provider Survey Responses**

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Survey Date</b>	<b>Services Summary</b>
<b>Center for Elder Law and Justice</b>	Non-profit Legal Services Provider	7/26/2022	Affordable housing development, housing counseling, and rental voucher administrators
<b>Cheektowaga Central School District</b>	School District	7/24/2022	Case management and rapid re-housing of homeless individuals and families in Erie County
<b>NeighborWorks Community Partners</b>	Non-profit	7/14/2022	Legal/ social service provider
<b>Compass House</b>	Domestic violence and youth housing services	7/13/2022	Coordinates human and housing placement services for youth and young adults

<b>Western New York Law Center</b>	Non-profit legal services	7/12/2022	Legal case management and counseling
<b>Legal Aid Bureau of Buffalo, Inc.</b>	Legal Service Provider	7/11/2022	Supportive legal services
<b>Town of Tonawanda Police Department</b>	Veterans Services	7/11/2022	Local law enforcement
<b>Amherst Generations Foundation</b>	Senior Services Nonprofit	7/11/2022	Foundation serving Amherst's aging population
<b>Peaceprints of WNY</b>	Institutional reentry services	7/8/2022	Social justice organization and transitional case work
<b>Harvest House of Buffalo</b>	Human service non-profit	7/8/2022	Religious based housing and human service care
<b>WNY Veterans Housing Coalition</b>	Housing services for Veterans	7/8/2022	Veterans human services and housing coordination
<b>Erie County Bar Association Volunteer Lawyer's Project</b>	Legal services	7/7/2022	Local legal case management

Consultation Summary Feedback & Findings

**List the organizations consulted, and summarize the feedback received from these entities:**

Discussions from the various in-person meetings (attendees listed in previous tables) yielded several key themes on needs and gaps that exist in the delivery of housing assistance and services for the qualifying populations. It should be noted that due to the housing/service delivery structure of the regional Continuum of Care system many of the themes are based on the region in general and not necessarily specific to needs and gaps within the Towns of Amherst, Cheektowaga or Tonawanda alone; these themes are listed below.

**Theme: Lack of Housing Supply**

- There's an overall lack of housing supply at all levels: emergency, rapid-rehousing, transitional, and permanent supportive.
- Homeless populations and families are staying in emergency placement and transitional housing much longer than in the past. There's an inability to move people along to the next level of housing, either supportive or permanent due to lack of supply.
- There's a lack of supportive and permanent housing options for larger families, 3+ bedrooms.
- Many of the housing supply issues stem from an overall lack of affordable housing in the market, including the rental market and home purchases.

- Current waiting lists for permanent housing assistance options, such as subsidized affordable housing complexes and Section 8 Voucher Programs are exceptionally long. Most subsidized housing complex waiting lists are 3-4 years long, and the Erie County Section 8 Housing Choice Voucher Program's waiting list is 10 years and is closed to new sign-ups due to the sheer number of people on the waiting list.
- More people are competing for the limited stock of housing at lower price points, which are driving up rental and home purchase prices, putting more cost-burdened stressors on families overall.
- HUD's "Housing-First Model" severely restricts service provider's ability to remove clients from supportive housing that are not following the rules or making progress towards self-sufficiency. This also creates a bottleneck in re-opening a unit to other clients in need.
- House fires are a common event creating homelessness as it's hard to rebuild from such a heavy loss and can set clients back years with a large financial burden to recover from.
- There's a lack of landlords willing to take Section 8 vouchers.
- Area motels that host emergency placement are located in isolated suburban communities, without convenient access to transportation and other services. While not ideal, emergency placement in motels is necessary due to the lack of other options in the region.

**Theme: Limitations and Issues with Supportive Services**

- Transitioning clients to the next level of housing is the biggest challenge. With a transition to permanent housing, case-management service capabilities (funding/staffing) drop off dramatically and in many cases clients would be successful long-term in maintaining permanent housing if case-management assistance lasted for another 1-2 years.
- Many cost-of-living expenses compound how qualifying populations succeed in permanent housing, i.e. transportation, food costs, child care, medical costs, etc.
- Traumatic Brain Injury populations struggle to stay in permanent housing and would be successful if long-term case management and other support services were available on an on-going basis. However, many of the current funding resources limit the timeframe by which support services can be provided.
- HUD's Housing First Model doesn't require clients to participate in supportive services, which creates no accountability for clients to be working towards transitioning to permanent housing.
- HUD's Housing First Model is unrealistic for clients that have had a life-time of issues and reoccurring homelessness. The 6-9 months supportive services expectation to have clients self-sufficient again is very unrealistic for these specific clients.
- Having placement housing options in suburban settings is beneficial for children in family situations due to the access to higher-quality schools, however suburban locations present transportation, childcare, mental health counseling and other service gaps from lack of proximity.
- Burn-out and high turnover amongst case management social workers is a real burden to organizations providing housing/services and the clients they serve. Additional resources are needed to reduce caseload burden for staff and competitive wages to maintain staffing.

**Theme: Housing Design Matters**

- Adaptive Reuse of existing buildings into assistance housing doesn't work well because design is very important to the success of facility operations and resident success. A skillfully designed new-build is better for all forms of assistance housing than conversions of a building.
- The use of motels for emergency placement is not working, they are unsafe, unhealthy options, especially for families with children. There's also a lack of kitchen appliances, convenient and frequent transportation options, and proximity to places of employment, and they can attract criminal activities.
- Placement in a motel requires the loss of 95% of client's belongings, creating an even bigger barrier to rebuilding their lives.
- Erie County Social Services' initial motel placement for families acts as a deterrent for families to seek help and entry into the CoC system.
- Non-congregate settings might not be best for all types of clients as some congregate settings can actually create a sense of community and support system, where helping each other contributes to client success.
- Suburban scattered sites are better reserved for situational homelessness (rather than chronic homelessness), as those clients most often need a one-time boost to land on their feet again.
- The Matt Urban Center Hope House Model should be used more where services are co-located with a one-stop shop: café, job placement services, transportation assistance and van services, childcare, GED classes, etc.

**Theme: Specific Populations' Needs are not met with Current Housing System**

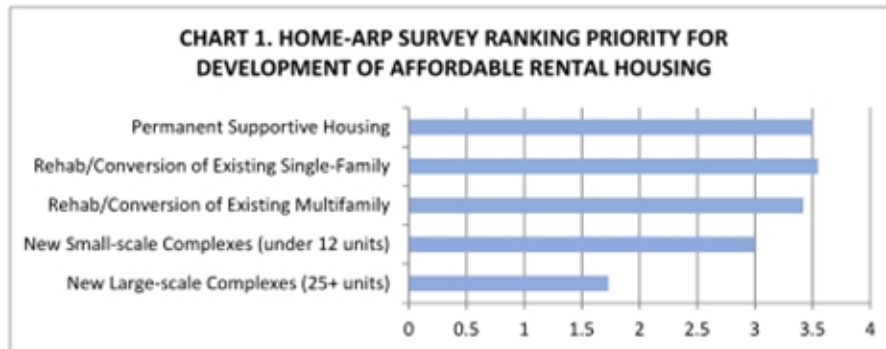
- There is a need for transitional housing for elderly individuals. Nursing homes are currently being used as transitional housing, but are being overwhelmed.
- Transitional housing is needed for individuals with history of substance abuse where they can also seek treatment. Cohousing units with a private room would be ideal for this where there can be a community of support.
- Abusive partners are often the household's primary breadwinner in domestic violence situations. A lack of affordable housing options in the Consortium (where there are strong public schools) makes it difficult for victims to leave dangerous situations.
- Homeless mothers don't always feel safe going to emergency shelters with their infants and need more appropriate transitional housing.
- Cost burdened households with disabilities need affordable housing options with ADA compliance or other special accommodations.

## Survey Results

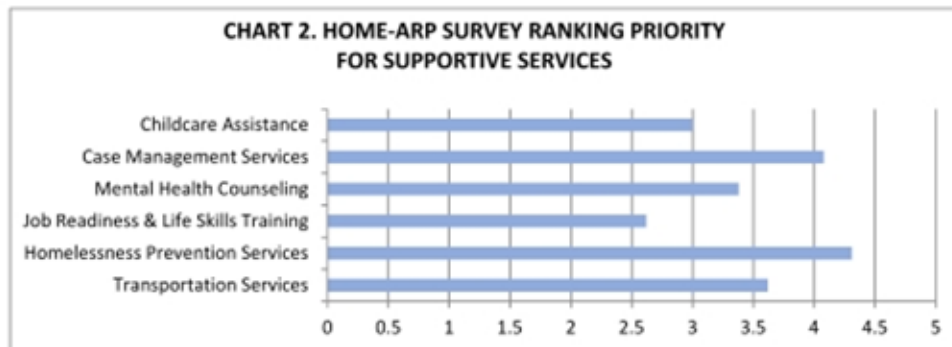
Much like the feedback that was received from the stakeholder and one-on-one meetings, survey responses emphasized the lack of affordable housing options. Respondents were from regional service providers for persons that are homeless or at-risk of becoming homeless, as well as free legal service providers. Respondents from these organizations reported that there is a strong need for more affordable units in general, and also a strong need for an assortment of affordable housing types, such as permanent supportive housing and co-housing. Permanent supportive housing was specifically mentioned by respondents as lacking for young adults, seniors, and persons with disabilities. Co-housing models with private rooms was reported as a conducive model for persons with disabilities, or mental health, or substance abuse issues.

The survey was developed as a means to rank the priority of eligible HOME-ARP activities. The development of affordable housing, tenant-based rental assistance (TBRA), and supportive services were ranked as equally high priorities among all of the eligible activities. Respondents cited specific issues such as rapidly rising rents, long waitlists, and a lack of affordable units with supportive care for persons with disabilities or substance abuse issues. Survey respondents reported that it is extremely difficult to place clients in proper housing that they can afford, but it becomes even more difficult if their client has special needs from a disability or substance abuse issue. New units and rental assistance were identified as the most beneficial activities for these types of clients. It should also be noted that hotel and motel placements ranked the lowest and was not prioritized over any other eligible activity, which was also reflected in the stakeholder meetings and one-on-one interviews.

The survey also asked respondents to prioritize the development of Affordable Rental Housing by the type of units that should be created (see Chart 1). The rankings indicated that permanent supportive housing; rehab/conversion of existing single-family homes; and, rehab/conversion of existing multifamily were the preferred "development styles" to create new affordable housing units for qualifying populations. New small-scale complexes (under 12 units) also scored high with a ranking of 3 out of a possible 6. New large-scale affordable apartment complexes (25+ Units) were not preferred as many providers simply do not currently have the capacity, although this may be a reflection of the survey respondents themselves as none have experience developing large-scale affordable housing.



Preferred supportive services mentioned in the survey included: legal services, mental health and substance abuse counseling, transportation services, and organizational outreach support (See Chart 2 below). In particular, organizational outreach support was reported as a significant gap in the service delivery of the region's Consortium of Care (CoC). Often times a significant barrier to delivering services is that most persons who are homeless or at risk of being homeless have little knowledge of the various organizations that can help. Assisting organizations with marketing and outreach is a significant undertaking and something many of the organizations in the CoC could benefit from.



## Public Participation

### Public Participation Process

***Describe the public participation process, including information about the dates of the public comment period and public hearing(s) held during the development of the plan:***

The ACT HOME Consortium provided opportunities for public participation on the Proposed HOME-ARP Allocation Plan through a 15-day public comment period and two public hearings.

<b>Date(s) of Public Notice:</b>	Amherst Bee – August 31, 2022 Ken-Ton Bee – August 31, 2022 Cheektowaga Bee – September 15, 2022
<b>Public Comment Period:</b>	September 1, 2022 – September 27, 2022
<b>Date(s) of Public Hearings:</b>	Amherst – September 19, 2022 Cheektowaga – September 27, 2022

On September 1, 2022 the Proposed HOME-ARP Allocation Plan was released for public comment and available for the required 15-day public comment period. The comment period was noticed in the Amherst Bee, Cheektowaga Bee, and the Ken-Ton Bee and copies of the Proposed Allocation Plan were made available the Town Clerk's Offices, Town Halls and Libraries of the ACT HOME Consortium communities in accordance with the Consortium's Citizen Participation Plan. Notices for public participation opportunities were also provided in newspapers serving minority populations: Challenger and Panorama Hispano. A copy of the public notices are provided in Appendix C. Interested citizens could also view the Draft Plan online on the Town of Amherst's Community Development website, which was also provided in the Notice. Citizens had the opportunity to submit written comments via US mail or email, as well as provide comments in-person at either of the two public hearings.

The two public hearings were held in the Towns of Amherst and Cheektowaga and citizens from all three Towns and Villages within their jurisdiction were invited. The first public hearing was held on September 19, 2022 at 7:00 PM in the Town of Amherst at the Amherst Town Board Meeting and the second public hearing was held on September 27, 2022 at 7:00 PM at Cheektowaga's Town Board Meeting.

### Efforts to Broaden Public Participation

***Describe any efforts to broaden public participation:***

To broaden public participation public hearings were held at regularly scheduled Town Board Meetings in order to increase attendance and awareness of the Proposed Allocation Plan. At the beginning of the public hearings, Town staff gave brief presentations on the Proposed Allocation Plan, outlining the amount of funding awarded and the range of activities that the ACT HOME Consortium will undertake, before opening it up for public comment.

At the start of the 15-day public comment period, copies of the Proposed Allocation Plan and notices for public comment were also provided via email directly to the stakeholders, government agencies, homeless service providers, and support organizations involved in the initial Consultation Process in

order for those organizations to distribute the Proposed Plan amongst their constituents and clients for broader feedback.

Lastly, copies of the notices were also provided to managers at shelter locations (rapid rehousing, transitional and permanent units) for posting at the facilities so direct feedback could be received from the qualifying populations the HOME-ARP money is intended to assist.

#### Summary of Comments Received

*Summarize the comments received through the public participation process either in writing, or orally at a public hearing:*

No written or oral comments were received from members of the public. Amherst Town Supervisor Brian Kulpa and Amherst Councilwoman Jacqueline Berger both commended on the work that went into the plan and indicated their support for the initiatives put forth in the HOME-ARP Allocation Plan. No other comments were made or received.

#### Response to Comments or Recommendations Not Accepted

***Summarize any comments or recommendations not accepted and state the reasons why:***

Not Applicable.



## Needs Assessment and Gaps Analysis

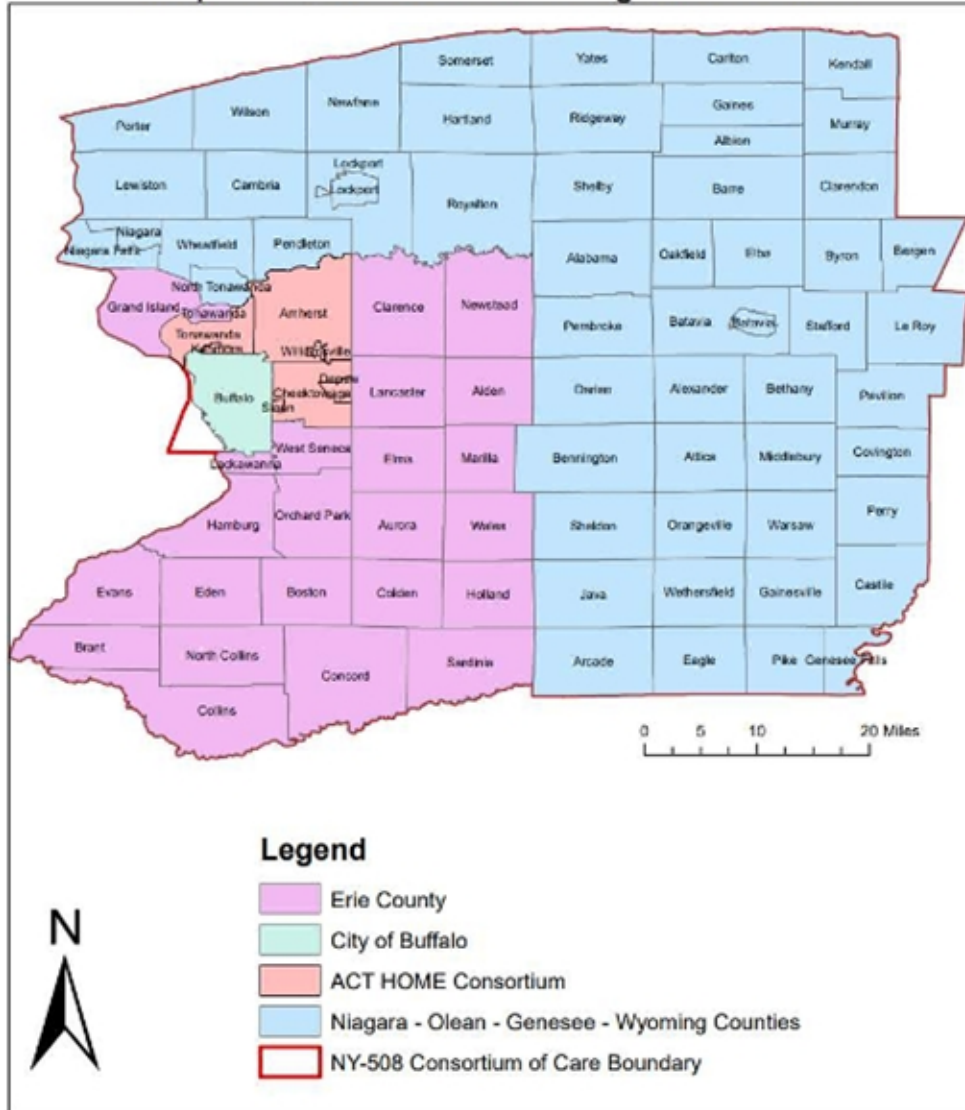
### ACT-HOME Consortium Jurisdiction & Existing Role

The Towns of Amherst, Cheektowaga and Tonawanda are first-ring suburbs of the City of Buffalo within Erie County New York and operate as a Participating Jurisdiction (PJ) for the purposes of HOME Entitlement funds. The PJ also includes the Villages of Sloan, Kenmore, Williamsville, and Depew (Western half) which exist within the Town boundaries. Presently all these municipalities play a limited role in delivery of housing and services for Qualifying Populations intended for assistance by the HOME-ARP funds. Other relevant Municipal roles include:

- The Town of Tonawanda and Village of Kenmore receive Homeless Assistance funding in the form of an annual entitlement Emergency Solutions Grant (ESG). The Town currently funds programs through Restoration Society Inc., Compass House, and the YWCA of the Niagara Frontier.
- The Village of Kenmore operates the Kenmore Municipal Housing Authority, a Public Housing Authority (PHA).
- The Town of Amherst is the municipal administrator of the Erie County PHA Section 8 Housing Choice Voucher Program. The Town's contractual administrator is Belmont Housing Resources of WNY.
- Each Town also provides limited support programs for households at-risk of homelessness through Community Development Block Grant entitlement funds.
- Each Town also receives annual HOME Investment Partnerships Program entitlement funds as part of the Consortium, and provides various programming to generate new affordable housing units (single-family and rental).

Aside from the funds and roles mentioned above, the HOME-ARP funding is the first meaningful award of resources the ACT HOME Consortium will have to directly address issues of homelessness jurisdiction-wide. However, it should be noted that the delivery system for housing, support services and care is currently established on a regional-basis, with the Housing Alliance for Western New York (HAWNY) operating the Continuum of Care (CoC) system for Erie, Orleans, Niagara, Genesee, and Wyoming Counties (See Map 1. HOME-ARP Planning Jurisdictions). While the CoC is a regional system, due to financial limitations, housing, services, and providers tend to concentrate in the Cities of Buffalo and Niagara Falls.

Map 1. HOME ARP Planning Jurisdictions



Homeless Alliance of WNY (Continuum of Care Administrator)

The Homeless Alliance of Western New York (HAWNY) is the Lead Agency for both the Continuum of Care (CoC) and the Homeless Management Information System (HMIS) in Buffalo, Niagara Falls, Erie, Niagara, Genesee, Wyoming and Orleans Counties (NY-508). As the lead agency for the region, HAWNY is responsible for coordinating the implementation of housing and service systems within its geographic area. The HMIS is the central database required by HUD under the HEARTH Act as the single point of entry/coordinated entry system for homeless services in the CoC. The HMIS captures client-level information over time on the characteristics and service needs of men, women, and children experiencing homelessness, including a non-duplicative count of homeless persons. Agencies under the CoC employ trained staff to perform client intake using HMIS. This requires the consent of the client and the data represent what the client agrees to disclose upon entry. The procedure has several components that are designed to standardize the intake process and assign placements based on priority. Clients are vetted for their status and prioritized based on their entry assessments and then referred to the proper shelter and/or service provider. Often, service-based housing, transitional, and permanent housing is not yet available and therefore the client will be placed on a waiting list within the system. These clients are prioritized in HMIS and are contacted when openings become available and match their respective needs.

Size and Composition of Qualifying Populations within ACT HOME Consortium

*Describe the size and demographic composition of qualifying populations within the PJs Boundaries:*

**Homeless as defined by 24 CFR 91.5**

According to HAWNY, approximately 236 homeless individuals were counted within the ACT HOME Consortium geography during their Regional 2021 Point-in-Time (PIT) count. This count aims to provide an estimate on the total number of homeless on any given day, as chronically homeless could be recounted throughout the year. In the entire NY-508 Continuum of Care boundary (Erie, Genesee, Wyoming, Niagara, Olean Counties), there were 663 total housed-homeless, with 70% located in Erie County.

However, it should be noted that while quantifying homeless populations for the ACT HOME Consortium, HAWNY identified some limitations of the Point-in-Time data (PIT). The HAWNY's explanation is that HMIS and PIT data may not accurately reflect

Jurisdiction	Zip Code of Last Permanent Address	Total
Amherst	14228	5
	14221	11
	14051	1
	14226	11
Cheektowaga	14225	27
	14212	89
	14227	13
	14043	15
Tonawanda	14217	20
	14223	13
	14150	31
<b>Grand Total</b>		<b>236</b>

the geography a homeless person is coming from for townships, and is better used at a larger geography, such as county level. This is due to how the data is collected (self-reporting). The HAWNY indicated that often clients report their current or recent emergency shelter address zip code rather than where they came from when first becoming homeless. Therefore a share of the PIT dataset may actually reflect the populations hosted in the ACT HOME Consortium's motels/hotels that have emergency shelter placement contracts with Erie County Social Services.

Unsheltered persons were not counted in HAWNY's PIT for 2021 due to the pandemic. Unsheltered homeless populations are generally documented by area police departments who periodically check on local homeless and know where they camp. At present Amherst has 2 homeless persons who are considered unsheltered and have repeatedly declined offers of assistance. In these instances, there is often a mental health issue complicating the person's ability to receive housing and services. Cheektowaga Police noted an average of 2-3 unsheltered homeless individuals annually. Cheektowaga Police have been successful in convincing clients to enter the CoC shelter system as they perform welfare checks in partnership with Endeavor Health Services for mental health case management with these individuals. Tonawanda Police report 2 homeless persons who are considered unsheltered and have repeatedly declined offers of assistance. In addition they are aware of a camp with an unknown amount of homeless people (estimate 5 to 6 people); however, patrols have not been able to make contact with them.

Homeless youth that are sheltered are generally counted as part of HAWNY's PIT data set. However, HAWNY's 2017 Unaccompanied Youth Homelessness Summary Brief outlines the hidden populations of unaccompanied minors (aged 11-17), as often times they "couch surf". The findings indicated 305 unaccompanied minors were experiencing homelessness in 2017; of which 30.5% identified as a parent and 41% reported their sexual orientation as "LGBTQ" or "questioning". The Brief identified the average age of unaccompanied minors being 15.5 years and the largest share spending their nights "couch surfing" (37%).

The McKinney Vento statistics tracked by School Districts outlined in Table 5 provide a sense of the number of children considered homeless or housing unstable within the Consortium. School Districts are required to track students whose housing situation is unstable or defined as those living doubled-up, couch-surfing, at-risk of homelessness, or otherwise unstably housed, which is more expansive than the HUD definition of homelessness. Table 5 shows the number of students in each school district per year who receive assistance under the McKinney Vento Act. These numbers include students who are unaccompanied as well as students experiencing homelessness with their families. The Kenmore-Tonawanda School District consistently has the highest student homelessness for any district in Erie County outside the City of Buffalo.

**TABLE 5. MCKINNEY-VENTO ACT ASSISTED CHILDREN BY SCHOOL DISTRICT**

School District	2014-2015	2015-2016	2016-2017	2018-2019	2019-2020	2020-2021
Amherst CSD	5	16	18	23	26	16
Sweet Home CSD	31	32	55	55	23	36
Williamsville CSD	18	14	13	20	33	14
Cheektowaga CSD	54	60	54	43	37	22
Cheektowaga-Maryvale UFSD	21	20	22	33	22	13
Cleveland Hill UFSD	28	9	19	13	13	10
Depew UFSD	16	13	18	27	14	11
Cheektowaga-Sloan UFSD	17	17	22	5	11	26
Kenmore-Tonawanda UFSD	93	111	135	143	121	127
<b>ACT HOME School Districts Total</b>	<b>283</b>	<b>292</b>	<b>356</b>	<b>362</b>	<b>300</b>	<b>275</b>

Source: NYSTEACHS database on student demographics for NYS.

**At-Risk of Homelessness as defined by 24 CFR 91.5**

The ACT HOME Consortium quantifies At-risk of Homelessness populations by reviewing the statistics from existing assistance programming and Public Use Micro Data Areas (PUMAs) data<sup>1</sup> reflecting incomes and housing-cost burdened households. The Consortium also has one Emergency Solution Grant (ESG) Program serving the Town of Tonawanda. In the 2021 Program Year, Tonawanda assisted 136 individuals using their ESG funds. Despite the COVID Pandemic, the program stayed consistent from the year before where 133 individuals were assisted in the ESG 2020 Program Year.

Cheektowaga and Amherst also provide Emergency Tenant Based Rental Assistance (ETBRA) to individuals and families at risk of eviction and homelessness funded by HOME Investment Partnerships Program funds and a special appropriation of CDBG-COVID. To-date, the ACT Consortium assisted 109 at-risk households with ETBRA.

According to the *Engaging the Future of Housing*<sup>2</sup> Report, income inequality is also rising in the region. The ACT consortium is no exception. The percentage of residents who are considered very low and extremely low income is significant in the Consortium, at levels of 21.1%, 22.7%, and 28.3% in Amherst, Tonawanda, and Cheektowaga respectively (see Table 6). Low and Very

<sup>1</sup> It should be noted that PUMA data, while more detailed on elements such as household financial information than US Census Bureau’s American Community Survey, the PUMA Areas may be delineated geographically across municipal boundaries in some cases. For example, while Amherst Town has its own standalone PUMA Area (#1202) the Town of Tonawanda and Cheektowaga are combined with other neighboring municipalities. This may skew the data set as Tonawanda is presented with a more affluent township (Grand Island) and Cheektowaga, is presented with poorer communities (West Seneca and Lackawanna). Regardless, the PUMA data does present a general characteristic of the state of incomes and housing cost burden to a more refined level than county-wide for the purposes of this Plan.

<sup>2</sup> Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead* (2021 for Local Support Initiatives Corp.)

Low incomes are thresholds that qualify for housing and rental assistance and represent a significant demand for services in the Consortium.

**TABLE 6. HOUSEHOLD INCOME BY PUMA GEOGRAPHY**

PUMA #	Municipality	Extremely Low Income (<30 AMI)	Very Low Income (30% AMI)	Low Income (50% AMI)	Total % of All Households (<50% AMI)
1201	City of Tonawanda, Towns of <b>Tonawanda</b> and Grand Island	12.1%	10.6%	17.9%	40.6%
1202	<b>Town of Amherst</b>	12.8%	8.3%	14.1%	35.2%
1204	City of Lackawanna, Towns of <b>Cheektowaga</b> and West Seneca	14.5%	13.8%	21.1%	49.4%

Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

At the same time, the number of cost burdened households (households which spend 30% or more of their income on housing) is notable (Table 7 & 8). Renters, however, are significantly more vulnerable. Not only are renters more likely to be cost burdened, but are likely to be considered severely cost burdened, defined as households that spend 50% or more of their income on housing. The percentage of cost burdened and severely cost burdened renters in Tonawanda, Amherst, and Cheektowaga PUMAs is 46.8%, 56.6%, and 49.9%, respectively. In other words, around half of all renters in the entire ACT HOME Consortium-PUMA Areas are considered cost burdened. In total, the number of cost burdened renters amounts to 44,861 individuals across the three (expanded) PUMA territories. While the total number of renters is ultimately less than total homeowners, the percentage of renters with cost burden poses a significant risk to overburdening the current homelessness prevention system in Western New York.

**TABLE 7. COST BURDEN OF OWNER-OCCUPIED HOUSING**

PUMA #	Municipality	Total Owner-Occupied spending 30% or more on housing	% Cost Burden (30%-50% of Income)	% Severe Cost Burden (50%+ of Income)	Total % of Owner-Occupied with Cost Burden (30%+)
1201	City of Tonawanda, Towns of <b>Tonawanda</b> and Grand Island	35,760	11.1%	7.2%	18.3%
1202	<b>Town of Amherst</b>	34,962	10.1%	5.9%	16.0%
1204	City of Lackawanna, Towns of <b>Cheektowaga</b> and West Seneca	45,301	12.6%	8.0%	20.6%

Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

**TABLE 8. COST BURDEN OF RENTER OCCUPIED HOUSING**

PUMA #	Municipality	Total Renters spending 30% or more on housing	% Cost Burden (30%-50% of Income)	% Severe Cost Burden (50%+ of Income)	Total % of Renters with Cost Burden (30%+)
1201	City of Tonawanda, Towns of <b>Tonawanda</b> and Grand Island	11,618	19.6%	27.2%	46.8%
1202	<b>Town of Amherst</b>	13,949	24.9%	31.7%	56.6%
1204	City of Lackawanna, Towns of <b>Cheektowaga</b> and West Seneca	19,294	23.4%	26.0%	49.9%

Source: *Engaging the Future of Housing I the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*

Amherst, Cheektowaga and Tonawanda also fund HUD-certified housing counseling for at-risk populations, foreclosure prevention counseling, and housing discrimination counseling in order to prevent homelessness. These programs have operated for many years and are currently provided by Belmont Housing Resources for WNY, Buffalo Urban League, and Housing Opportunities Made Equal. In the last year the total number of households counseled in the Consortium for a housing instability issue was 370.

Most recently, due to processing of Post-COVID eviction proceedings the Town of Amherst has begun funding homeless households with assistance to move to a new rental unit. For these cases, CDBG-COVID funding is used to pay first month, security deposit and up to four months rent for a new apartment. Apartments chosen are screened for affordability and assisted clients are typically in one-time event-driven situations. Prior to COVID the Town hadn't funded these types of cash assistance awards, so there is no ability to comment on trends pre and post COVID. At present however, the Town is receiving about 1 application a month for these situations.

**Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice.**

According to Erie County, its Child and Family Services division serves domestic violence victims in WNY for emergency housing. The County manages the region's only 36-Bed Emergency Shelter Program for domestic violence victims and the facility is located within the City of Buffalo. County provided statistics indicate the division serves approximately 1500 unique individuals annually, most are women and children.

The ACT HOME Consortium also reached out to the non-profit Family Justice Center of Western New York, which is a primary provider of assistance to domestic violence victims and serve clients at earlier stages of intervention, often before cases escalate to Child and Family Services.

Currently the Family Justice Center maintains a satellite office in Amherst and estimated their current client base within the Consortium at 288 clients, with 165 clients experiencing housing instability. The total number of persons affected by domestic violence in the Consortium increases to 521 persons if clients' children are included in the counts.

**Other Populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.**

Disabled Populations

Also indicated in the *Engaging the Future of Housing* Report, households with persons with disabilities are significantly more likely to be cost burdened compared to other households. As shown in Table 9, households occupied by a person with a disability are between 33% and 40% housing-cost burdened within ACT HOME Consortium-PUMA areas consulted. More notably, households occupied by a person with a disability are between 10% and 20% more likely to meet the definition of cost burdened. Therefore, disabled populations should be considered “at greater risk of housing instability”.

In consultation with disability advocacy and service organizations this sentiment was reinforced. Concerns focused on a general lack of appropriately designed affordable housing options regionally (ADA, visual or deaf impairment, Visit-ability) and the inability for low-and-moderate income disabled persons to renovate housing units to meet their needs. Another main theme presented was the limited amount of disabled-supportive housing in the region that constrains developmentally-disabled adults from living independently. According to People Inc., there are currently 516 developmentally disabled adults on New York State’s Office of Temporary and Disability Assistance emergency waiting list for housing.

**TABLE 9. COST BURDEN FOR HOUSEHOLDS OCCUPIED BY PERSONS WITH DISABILITIES**

PUMA #	Municipality	With Disability		No Disability	
		Cost Burden	No Cost Burden	Cost Burden	No Cost Burden
1201	City of Tonawanda, Towns of Tonawanda and Grand Island	35.9%	64.1%	21.9%	78.1%
1202	Town of Amherst	40.2%	59.8%	24.4%	75.6%
1204	City of Lackawanna, Towns of Cheektowaga and West Seneca	33.7%	66.3%	27.8%	72.2%

Source: *Engaging the Future of Housing in the Buffalo Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead (2021)*



## Veterans

Another special population that is vulnerable to housing instability within the Consortium are veterans. According to the 2021 PIT count, 32 of the sheltered clients were veterans. Local supportive service and rapid rehousing providers for Veterans report having 25 clients within the ACT consortium area citing a lack of affordable housing units and rising housing costs as the biggest obstacle for their clients.

## Elderly

Other special populations such as seniors or those who generally have fixed incomes are also particularly vulnerable to homelessness in the ACT consortium. According to the PIT counts from HAWNY, seniors or those over 65 years old make up a small number of those within the HMIS database. However, this number has doubled for the ACT consortium from 2019 to 2021. This is not surprising given the rising costs of rental housing.

## Consideration of Current Resources Available to Assist Qualifying Populations

***Identify and consider current resources available to assist qualifying populations, including congregate and non-congregate shelter units, TBRA, and affordable and permanent supportive rental housing:***

### **Current Congregate and Non-Congregate Shelter Units**

The ACT HOME Consortium does not host any emergency shelters that would be considered congregate. Area motels and hotels located in the Consortium do serve as non-congregate shelters for emergency placement by the Erie County Department of Child and Family Services. Non-congregate shelter is the term used for emergency shelters that provide accommodations in a way that provides private space for guests. Most of these motels/hotels are located on Niagara Falls Boulevard and Transit Road and are less than ideal for placements due to lack of proximity to services, lack of transportation options, and overall distance from city service providers. Motel placements have also been mentioned periodically by school district social workers as objectionable due to "incidences of crime", "isolation created due to lack of a car", "lack of safety", "overcrowding of motel rooms", "and reduction of belongings to enter", and "lack of kitchen facilities".

### **Current Tenant Based Rental Assistance (TBRA) Programs**

There are two main TBRA programs in Western New York serving Erie County. One is the Erie County Public Housing Authority (PHA) Section 8 Rental Voucher Program, administered by Belmont Housing Resources for WNY on behalf of the Town of Amherst (Lead Jurisdiction). The Erie County PHA currently provides approximately 5,365 tenant-based vouchers annually and has a closed 10-year waiting list. An additional 73 Emergency Housing Vouchers were also received by the Erie County PHA from COVID relief funding specifically for homeless individuals and at this time are all allocated. The other main Section 8 Rental Voucher Program operating regionally is administered by Rental Assistance Corporation (RAC) and typically serves 5,200 households annually. The RAC waitlist is approximately 4-5 years long, but opens periodically to accept new applicants.

Within the ACT HOME Consortium, approximately 527 households receive TBRA from the Erie County PHA Section 8 Vouchers. However, it's difficult to quantify the number of ACT HOME Consortium residents that are on the Section 8 Voucher waiting list as many residents move around and neglect to update their contact information with Belmont.

The Town of Tonawanda's Emergency Solution Grant (ESG) funding also provides direct rental assistance and rapid-rehousing assistance via Restoration Society Inc., Compass House, and the YWCA of the Niagara Frontier. In 2020 and 2021, ESG funding assisted a total of 25 and 9 households respectively. An additional special COVID appropriation of ESG funds also assisted approximately 73 households with various types of rental assistance.

Amherst and Cheektowaga are not eligible for ESG funding. However, both Towns provided rental assistance via special CDBG-COVID funding received in 2020. Amherst and Cheektowaga's Emergency Rental Assistance (ERA) Programs assisted renters for up to 6 months of arrears or current rent. The programs assisted low-to-moderate income households facing eviction due to a COVID-related financial impact. As mentioned previously, approximately 111 households were assisted with the Consortium's ERA programs. These COVID era programs are anticipated to end by March 2023.

The CoC also administers a variety of Rapid Rehousing and Scattered-site Permanent Supportive Housing for those with disabling conditions. Consultations with area non-profit service providers indicated that a majority of the Rapid Rehousing and Scattered Sites serving the CoC geography are located within the City of Buffalo, while a few small complexes (4-8 units each) exist in Cheektowaga and Tonawanda. A majority of scattered site Supportive Housing is contracted through the Erie County Department of Mental Health (DMH) and is eligible to County residents with severe mental illness. However, in consultation with non-profit providers, scattered sites located in suburbia were not considered ideal for mentally ill clients, as they can be isolating for clients and difficult to case manage.

### **Current Affordable and Permanent Supportive Rental Housing**

The Kenmore Housing Authority (KHA) has two developments within the boundaries of the ACT HOME Consortium. Kenmore Village Apartments and Theater Apartments each offer 97 one-bedroom units for the elderly. There are 10 accessible units in each building. KHA's buildings are normally at full occupancy and the length of stay is predominantly 5-10 years (29%) and 10-20 Years (27%). Though 29 households were classified as "disabled," 194 requested accessibility features in their units. Residents of the complexes have an average annual income of \$17,078 (2020-2024 Consolidated Plan for the ACT HOME Consortium). As of mid-2019, the Kenmore Housing Authority had 530 applicants on its waiting list. There are no other public housing authority developments in the Towns of Amherst, Cheektowaga, and Tonawanda.

Amherst hosts 16 affordable multifamily rental complexes financed as either Low-Income Housing Tax Credits (LIHTC) deals or HUD Project-based Section 8. The 16 complexes provide a total of 2,028 units, 48% of which are 55+ Senior housing. Many of the existing affordable complexes include sizable wait-lists. The rental market overall is tight in Amherst with a considerable college student population from the University at Buffalo and Daemen University

driving up competition for lower-cost market rate rental units. While college students generally are ineligible for subsidized rental housing units, the overall market demand for off-campus housing created by students, plus the growing loss of single-family home rentals to investor Airbnbs, are driving up rent prices locally as a whole.

Approximately 10,602 units or 32%, of Cheektowaga's occupied housing units have renters residing in them. To serve the rental market in Town, there are 8 affordable multifamily rental complexes that have either been financed as Low-Income Housing Tax Credits (LIHTC) deals or HUD Project-based Section 8. The 8 complexes provide a total of 755 units, 76% of which are 55+ Senior housing. Of the existing complexes, 3 provide supportive services to their residents, whether they are seniors, physically disabled, or visually impaired. In addition to the existing complexes, there is currently 1 additional complex under construction in the Town of Cheektowaga, that will provide an additional 67 units to those age 55+. Construction is expected to be complete by the end of 2022.

Tonawanda hosts 8 large affordable rental housing complexes whose tenants typically also receive Section 8 Housing Choice Vouchers. Soon, Tonawanda will have another new large multi-family affordable housing complex, Victoria Place, which has an expected construction-rehab start in 2023.

People Inc. is a major provider of supportive services for the developmentally disabled in WNY and owns and operates many group homes and permanent supportive rental housing in Western New York. Their new project, Blocher Homes Apartments, is in pre-development stages to create 93 units of affordable and supportive housing in Williamsville, NY. Twenty of the units will include a rental subsidy from the NYS Office of Persons with Developmental Disabilities (OPWDD). People Inc. currently owns and operates approximately 288 units of affordable apartments and supportive rental housing throughout 11 complexes within the ACT HOME Consortium.

Other permanent supportive rental housing complexes include only a handful of 2-8 unit scattered sites provided by regional non-profit service providers in Amherst, Cheektowaga and Tonawanda. When asked if there was demand for these types of units during consultation, providers indicated that suburban scattered sites require the right clientele for placement and are harder to case manage and can be isolating for their clients due to lack of transportation, walkable amenities and support programs. However, for households with children, placement in good school districts with adequate social services was desired.

### **Current Supportive Services**

The following supportive services are currently provided for residents by the ACT HOME Consortium's CDBG and HOME funded subrecipient providers: housing counseling; fair housing counseling; foreclosure prevention counseling; case management for victims of domestic violence; senior van transportation services; senior outreach; community policing; and at-risk youth/childcare programs. In addition, Tonawanda's ESG funding provides: homeless street-outreach; rapid-rehousing and homelessness prevention services (case management, security

deposits, rent assistance); moving-costs/initial rent; emergency shelter operations and essential shelter services.

Aside from CDBG, HOME, and ESG funded programming, residents of Erie County can access various non-profit providers via WNY's 211 network, who assist in screening callers for need against program criteria and referring callers to appropriate programming and service providers.

## Unmet Housing and Service Needs of Qualifying Populations

***Describe the unmet housing and service needs of qualifying populations, including but not limited to sheltered and unsheltered homeless populations; those currently housed populations at risk of homelessness; other families requiring services or housing assistance or to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations:***

### **Homeless as defined by 24 CFR 91.5**

Homeless populations considered "sheltered" within the ACT HOME Consortium are currently housed in area motels/hotels that have contracts with Erie County Social Services for emergency sheltering. The 2021 Inventory of Housing Facilities PIT count conducted by HAWNY indicated a utilization rate of 100% of the 21 beds under contract by the County<sup>3</sup>. Aside from the motels/hotels under contract with Erie County there are no other non-congregate emergency homeless shelters located within the Consortium and citizens coming from Amherst, Cheektowaga, or Tonawanda rely heavily on City of Buffalo, Erie County, and Niagara County's emergency shelter facilities for placement.

A regional trend outlined in the consultation process for sheltered homeless was the inability to move people into more appropriate longer-term housing (transitional, permanent supportive, affordable housing) in a timely manner. Emergency Shelters are meant to be short term 1-2 days, but rapid-rehousing options and other next-level facilities have remained full or near capacity for longer and longer periods, creating a bottleneck. This trend is reflected in the 2021 Inventory of Housing Facilities PIT Count as all the Rapid Rehousing facilities within Erie County had a 100% Utilization rate (total 398 Beds). In fact, of the total Emergency Shelter beds available in Erie County in 2021 (523 beds), 340 beds or 65% were occupied at the time of the Count. The 2021 PIT facility count also showed between 84%-100% utilization rate for permanent supportive housing in Erie County (1158 beds out of a total of 1244 were occupied).

In addition, consultation discussions yielded a regional lack of housing for larger families. This was mentioned in regards to the inappropriate nature of placing families with multiple children into emergency shelters or motels/hotels. It was also brought up from veteran's organizations, where a family's best option for placement sometimes meant splitting up a family between men-only or women and children only facilities, which again is not ideal.

For unsheltered homeless, typically the chronically homeless with mental health or addiction issues, the needs are more service based. For example, seasonal based support for those that

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<sup>3</sup> This is a regional bed count figure and doesn't reflect the total number of ACT HOME Consortium facility beds.

choose not to enter to the shelter system, case management, or easy access to transportation as a means to stay in support programs. In the ACT Home Consortium, support for the chronically homeless who are unsheltered is provided informally by the Police Departments, who offer rides to facilities and check-ins periodically. However, this population can fall through the gaps and local first responders should share knowledge of unsheltered homeless populations with other regional support service providers in order to ensure on-going check-ins and consistent offers for assistance are made.

For Youth shelters, such as Compass House, HAWNY PIT Inventory datasets indicated an adequate amount of capacity in the County as a whole. However the 2017 Unaccompanied Youth Homelessness Brief outlines an additional need for shelters catering to unaccompanied youth. Other needs outlined in the Brief and Compass House consultation include needing a 24 hour drop-in center for safe places for teens to congregate, connect to other resources, and learn life-skills; programs that expand rental assistance to teens falling through HUD definition cracks via the “couch-surfing” homelessness classifications; assistance with application fees for apartments and appliances; and mental health services with transportation included.

#### **At-Risk of Homelessness as defined by 24 CFR 91.5**

At-risk populations currently have a wealth of service resources available to them to avoid homelessness in the ACT HOME Consortium. What isn't available however are affordable housing options, plus temporary short-term assistance for families and individuals that lose their homes and need to move into new units, especially for households at lower income brackets (30-60% AMI) or single-parent households.

The populations at risk of homelessness are even more vulnerable when you consider the regional and national trend of stagnant income growth, inflation and rising housing costs. Unfortunately, this is not a new trend or simply because of the COVID-19 Pandemic. Lack of income growth especially in the Western New York region has been a decades long trend. New York State wages had annual growth rate of 1.52% between 2012 and 2018, whereas the Buffalo-Niagara region experienced 1.15%. While incomes have remained stagnant in the region, rents and mortgage rates have been increasing at faster rates than incomes<sup>4</sup>. According to the *Engaging the Future of Housing* Report, Median Inflation-Adjusted Sales Prices in the Buffalo-Niagara region increased by 83% from 2012 to 2020 for single family units. Likewise, PUMA areas 1201, 1202, and 1204 increased between 73% and 76%<sup>5</sup>. These trends are adding pressure onto already vulnerable populations.

Cost burden, particularly among renters, has also created a significant and growing at-risk population in the ACT consortium. The 2020 American Community Survey's 5-year Estimates detail Median Gross Rents of \$1,124, \$864, and \$862 in Amherst, Cheektowaga and Tonawanda respectively, which reflect a 12-17% increase for the Consortium from 2015 Median Gross Rents. An extremely low-income 2-person household paying these rents would constitute a housing cost burden of 64%<sup>6</sup>. For individuals entering the CoC system as homeless, self-

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<sup>4</sup> Source: *Engaging the Future of Housing* (page 60; Table 21)

<sup>5</sup> Source: *Engaging the Future of Housing* (page 80; Table 27)

<sup>6</sup> Based on HUD Buffalo Metropolitan Statistical Area's 30% Area Median Income figures.

reporting indicates that evictions (whether by the landlord or through housing court) is one of the most likely reason for an individual or family to become homeless. Therefore, the risk of becoming homeless due to rising rents and housing costs is a major factor.

Aside from the need to increase affordable housing options, it seems that populations that suffer from mental health issues; household disputes; domestic violence; substance abuse; and overall loss of income events are the other primary reasons for homelessness of at-risk populations in the Consortium (See Table 10). Because of these contributing factors, HOME-ARP supportive service programming funding should focus on providing these services for at-risk qualifying populations.

Primary Reason Homeless	Amherst	Cheektowaga	Tonawanda	Grand Total
Ask to leave by landlord		10	5	15
Court eviction by landlord	2	11	3	16
Criminal Activity		1		1
Data Not Collected	1	9	3	13
Domestic Violence	5	8	6	19
Doubled-Up/Over Crowded	1	7	1	9
Eviction by primary tenant	1	9	6	16
Fire Disaster		1		1
Fire or Natural Disaster		3		3
Health/Safety Violation	1	6	1	8
Household Disputes (not DV)	4	19	10	33
Loss of Job/Income (includes public benefits)	3	19	4	26
Medical Condition	1	4	1	6
Mental Health	4	17	10	31
Mortgage Foreclosure of own home			1	1
Problem with landlord		1	2	3
Problems with building		4	2	6
Release From Institution	2	2	4	8
Relocation from out of the NY-508 CoC Area			2	2
Substance Abuse	3	12	3	18
Substandard Housing		1		1
<b>Grand Total</b>	<b>28</b>	<b>144</b>	<b>64</b>	<b>236</b>

**Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice.**

As mentioned previously, the County maintains a shelter for Domestic Violence victims, Haven House. Other housing facilities serving these special qualifying populations within Erie County include the Pathstone Corporation and the YWCA of Western New York. Haven House provided shelter to 211 adults and 121 children; counseling or advocacy to 1,848 individuals; and took over 1,200 hotline calls for assistance, throughout Erie County last year. Amherst also hosts four permanent supportive housing units owned by the YWCA for their clientele.

The Family Justice Center of WNY (FJC), a major non-profit service provider for victims of domestic violence, has begun to operate a few safe transitional housing facilities for victims in association with church owner-developers in WNY. In consultation, the Family Justice Center indicated there were not enough options for housing in suburban and rural locations within the county. At this time, the Center indicated a preference to utilize HOME-ARP funding for creation of new supportive housing with high security features in suburban settings (where a majority of their clients are coming from and their children are enrolled in school), as well as short-term TBRA for families to re-establish their lives in a new unit, and services to enhance victim safety while housing situations are sorted-out. In general the Center indicated if the latter two programs mentioned were established many clients would completely avoid entry into the homeless CoC system and limit disruption to their children.

Service needs mentioned for this qualifying population includes assistance for the purchase of safety technology, such as Ring door-bells, home security systems, tracking-device detectors, virtual tools for family court attendance, and burner phones. Many of the funding sources for domestic violence service agencies don't cover these costs, which can add up and are essential for helping victims maintain safe housing.

**Other Populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.**

Disabled

As mentioned previously, a general lack of appropriately designed affordable housing options regionally (ADA, visual or deaf impairment, Visit-ability) and the inability for low-and-moderate income disabled persons to renovate housing units to meet their needs is a major unmet need. Another main theme presented was the limited amount of disabled-supportive housing in the region that restrict developmentally-disabled adults from living independently.

People Inc, a major non-profit service provider for developmentally-disabled individuals has been managing 220 units in the ACT consortium and 1,227 within Erie County. While People Inc. manages their own units, they do have a desire to take on more units which could benefit their clients. Their clients especially have trouble finding affordable housing on top of having close proximity or transportation to the services they need. When disabled individuals do find housing, they often times need accommodations to be made within the units such as ADA

ramps and bathrooms. These come with a cost and landlords are often hesitant to make the investment. Even though the accommodation is required by law, legal services and representation is a need for the disabled population in the ACT consortium for this reason.

#### Veterans

WNY Veterans Housing Coalition is the major non-profit supportive service provider for WNY veterans. WNY Veterans Housing Coalition provides case management and housing services for regional veterans in need. They serve 25 clients within the ACT consortium as of 2022 and have 120 housing units within the Consortium of Care boundary. Lack of affordable units and mental health support was reported as the biggest unmet need and gap in services. Many of their clients need supportive mental health counseling in addition to affordable housing options to maintain housing.

#### Elderly

The PIT counts from HAWNY for seniors (those over 65 years old) only make up a small number of those within the HMIS database. However, this number has doubled for the ACT consortium from 2019 to 2021. This is not surprising given what we know about rising costs of rental housing within this report. Senior Services social workers indicate the lack of 2-bedroom affordable rental units as an issue in convincing seniors to enter affordable apartment complexes when they can no longer maintain their single-family homes and most cannot afford market-rate apartment rentals on limited Social Security Incomes. Service providers with elderly clients reported legal needs as a significant service gap. Many clients need legal representation for their housing needs. Elder Law and Justice serves 1,360 clients within the ACT consortium. Many of which needed assistance with evictions, mortgage foreclosures, wills, deeds, health care proxies, and powers of attorney.

### Gaps & Unmet Needs in the Current Shelter, Housing and Service Delivery System

#### ***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***

Table 11. below is HUD's preferred table format to showcase gaps in the shelter, housing and delivery system in the ACT HOME Consortium. The Table identifies gaps by comparing homeless populations living in or coming from the ACT HOME Consortium to the facilities/beds of various shelter/housing options available in the jurisdiction to serve these populations. Unfortunately, due to the structure of the Coordinated Entry system and the CoC's regional delivery system, it's difficult to populate the table for the ACT HOME Consortium jurisdiction alone. This table would reflect a more accurate representation of gaps if completed on a County-level and include City of Buffalo jurisdictions, where a majority of qualifying populations ultimately receive housing/services currently (See Table 12).



**TABLE 11. HOMELESS NEEDS INVENTORY AND GAP ANALYSIS for ACT HOME CONSORTIUM**

Homeless													
	Current Facility Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	21	21	21	21	0								
Transitional Housing	0	0	0	0	0								
Permanent Supportive Housing	12	4	0	0	0								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						NA	236	32	16				
Unsheltered Homeless						NA	7	NA	NA				
<b>Current Gap</b>										NA	NA	-210	-218

**Suggested Data Sources:** 1. 2021 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. ACT 2021 CAPER; 4. ACT Police Departments. **NA= Not Available**

For the Table reflecting the ACT HOME Consortium jurisdiction, it should be noted that some data sets were not available (NA) or HAWNY was unable to breakout the data into separate categories of populations for Consortium Zip codes (i.e. Adults vs. Families). Therefore Table 11 is populated based on the 236 individuals identified as “sheltered” homeless coming from ACT HOME Consortium zip codes in the 2021 HAWNY Point-in-Time counts, the 7 individuals estimated from area police departments, and the 16 victims of domestic violence housed in the YWCA’s Amherst Permanent Supportive Housing units (4 units). It should be noted that McKinney Vento stats for 2021 were not included in Table 11 either due to the likelihood of double-counting persons/families already tracked by the School Districts (275 school children in Consortium’s districts were assisted in 2021).

The only other known emergency shelters in the Consortium are those contracted motel/hotel units with Erie County Social Services (21 Beds) and this figure may also include motels/hotels outside of the ACT HOME Consortium jurisdiction. Table 11’s Gaps for the Consortium identified -208 beds and -216 units, which are a reflection of the 33 beds/25 housing units available minus the estimated 241 total homeless persons counted. However when evaluated on a regional delivery system basis, Erie County’s gap analysis table reflects a positive capacity of approximately 2,000 beds in the overall supply of shelter/bed options.

**TABLE 12. HOMELESS NEEDS INVENTORY AND GAP ANALYSIS for ERIE COUNTY**

Homeless													
	Current Facility Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	451	NA	523	NA	NA								
Transitional Housing	585	NA	585	NA	38								
Permanent Supportive Housing	1244	NA	1244	NA	367								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						44	324	47	54				
Unsheltered Homeless						NA	NA	NA	NA				
<b>Current Gap</b>										+2,236	NA	+2,028	NA

**Suggested Data Sources:** 1. 2021 Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); **NA= Not Available by unit & unsheltered Homeless not counted in 2021**

**Documented Increased Risk of Instability**

**Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:**

While, the ACT HOME Consortium does not intend to utilize and define preferences for “other populations” for the allocation of HOME-ARP funding, it should be noted that Veteran and Disabled Populations have a documented “increased risk of homelessness” regionally. For information pertaining to this conclusion, see the Unmet Housing and Service Needs discussion on pages 25-29.

**Priority Needs**

**Identify priority needs for qualifying populations:**

**Development of Affordable Rental Housing**

Priority needs for the homeless populations located within the Consortium should focus on the creation of additional affordable rental units, and supportive services to better assist those facilities. The 100% utilization rates reflected in HAWNY’s facilities inventories from 2017-2019 show the preference for placement of homeless households into rapid-rehousing programs and facilities over emergency shelters. The rapid-rehousing model is a more stable model to provide support services and case management in order to successfully graduate clients out. However,

the lack of affordable rental housing units was mentioned repeatedly as the main bottleneck issue keeping rapid-rehousing capacity full and creating extended stays in emergency shelters, even as regional homelessness has been trending downward. More specifically, the lack of affordable housing regionally is creating situations hindering success in maintaining housing stability and self-sufficiency. Even in rapid-rehousing programs that provide rental vouchers clients are experiencing increased difficulty trying to find a rentable unit to utilize their voucher. This same trend is occurring with Section 8 Housing Choice Vouchers, where administrators have been extending deadlines simply because there isn't enough affordable housing rental stock.

It should also be noted, that the suburban nature and limited NFTA bus routes of the ACT HOME Consortium make it inappropriate for the creation of additional non-congregate shelter units in the Consortium. Common themes from non-profit service providers indicate few clients succeed in such isolating environments.

### **Supportive Services**

Supportive services in general are considered a major factor in determining long-term client success and the ACT HOME Consortium intends to fund a broad range of supportive services as separate activities or in combination with other HOME-ARP activities. Consultations indicated the need to do everything possible to make it easier for persons struggling with underlying issues contributing to homelessness to get the care and support they need and for a longer period than the 2-year rapid-rehousing and transitional housing models will allow. Many personal issues were found to compound a client's unstable housing situation, so the more options for service assistance the better. For example, transportation and childcare are essential to helping adults access and keep mental health appointments, attend job interviews, stay employed, finalize divorce settlement agreements to receive child support, and maintain sobriety.

While the Consortium will entertain proposals for all eligible supportive services outlined in HUD Notice 2021-10 (as long as they meet Consortium requirements) the following supportive services are considered priorities:

- **Extended case management** provided for qualifying populations that require additional support after graduation out of a 2 year limited rapid-rehousing or transitional care facility.
- **Childcare Assistance (intermittent and regular)**
- **Mental Health Services**
- **Transportation Services**
- **Legal Services** including subject matters that affect income (child support), personal safety, and citizenship, etc.
- **Translation Services/English Language Learning**
- **Technology Assistance for Domestic Violence Victims**

## Determination of Needs and Gaps Methodology

***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

To quantify the qualifying populations within the ACT HOME Consortium and effectively outline unmet needs and gaps of these populations within the current housing and service delivery system, the Towns analyzed existing datasets, existing resources and programs, current reports and plans, in addition to the qualitative data provided by the consultation process. The following data sets and reports/plans were reviewed as part of the Needs and Gaps Analysis:

### **Data Sets:**

- Homeless Management Information System (HMIS) – HAWNY (2017-2021)
- HAWNY Point-in-Time Data for Erie County (2017-2021)
- HAWNY Point-in-Time Data Summarized for Amherst, Cheektowaga and Tonawanda Zip Codes (2017-2021)
- HAWNY Point-in-Time Data for Veterans (2018-2021)
- HAWNY Point-in-Time Data for Youth (2018-2021)
- 2018-2020 Facility Inventory List for Erie, Niagara, Orleans, Genesee & Wyoming Counties (HAWNY)
- U.S. Census Bureau American Community Survey 2019 5 Year – Public Use Microdata Areas (PUMAs)
- McKinney Vento Statistics by ACT HOME Consortium’s School Districts (NYSTEACHS)
- Regional Domestic Violence Case Management Statistics by Family Justice Center- Erie County
- Erie County Public Housing Authority Section 8 Housing Choice Voucher Waiting List
- Amherst, Cheektowaga and Tonawanda Police Department Reporting

### **Reports & Plans:**

- ***Analysis of Impediments to Fair Housing Choice*** (2020, Erie County with Town of Hamburg, ACT HOME Consortium and City of Buffalo)
- ***2020-2024 Amherst-Cheektowaga-Tonawanda Consortium HUD Consolidated Plan***
- ***Engaging the Future of Housing in the Buffalo-Niagara Region: A Preliminary Exploration of Challenges that Lie Ahead*** (Jason Knight/Russell Weaver for LISC WNY, September 2021)
- ***Market Demand for Senior Rental Housing*** (UBRI for Amherst IDA, Sept 2012)
- ***2020 Erie County Homelessness Brief*** (HAWNY)
- ***2019 Veterans Homelessness Brief*** (HAWNY)
- ***2017 Unaccompanied Youth Homelessness Brief*** (HAWNY)
- ***Homelessness among Youth Adults in Buffalo: A Research Report Highlighting Youth Voices*** (UB School of Social Work & HAWNY)

## HOME-ARP Activities

Methods for Selecting Developers, Service Providers, Subrecipients and/or Contractors  
**Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:**

The ACT HOME Consortium will not directly provide services or develop new HOME-assisted units for the qualifying populations as part of HOME-ARP programming. The Consortium's activities will fund subrecipients for eligible project/service types through request for proposals processes that follow Federal and local procurement policies. Proposals will be competitively scored and reviewed by a committee made up of municipal staff involved in community development, affordable housing, social and senior services, disabilities and youth services.

### Administrative Role

**If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:**

No HOME-ARP funds, administrative or otherwise, were released to subrecipients prior to HUD's acceptance of this HOME-ARP Allocation Plan. The Consortium also does not intend to contract-out administrative or programmatic oversight duties as part of the HOME-ARP funding.

### HOME-ARP Program Allocations for ACT HOME Consortium

#### **Use of HOME-ARP Funding**

Eligible Program Areas	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$120,000		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$3,000,000		
Non-Profit Operating	\$85,000	2.5%	5%
Non-Profit Capacity Building	\$90,700	2.7%	5%
Administration and Planning	\$118,000	3.5%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$3,413,700</b>		

#### Allocation of HOME-ARP Funding

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

The majority of HOME-ARP funding for the ACT HOME Consortium will be allocated to the development of affordable rental housing. HOME-ARP units will be generated via a subsidy for construction applied to units within larger multifamily affordable housing projects and/or as part of small stand alone in-fill projects that provide 2-12 units for qualifying populations who typically can succeed in suburban environments.

Supportive Services are the second largest funding category and will entertain proposals for all of the eligible services outlined in the HUD Notice 2021-10, with a priority placed on those services mentioned under the priority needs summary above.

The remaining funding categories of the Allocation Plan Budget include non-profit capacity building and operating expenses. Through consultation it was clear that some smaller non-profit service providers would develop outside the City of Buffalo, if they received assistance for capacity building, operating expenses and supportive services to make their smaller suburban-outlier facilities successful.

#### Funding Priorities Rationale

***Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:***

Since regional homelessness totals have been declining it's clear the gaps and needs simply outline an overarching need for additional affordable rental units, as stock is limited at multiple levels of the housing market and squeezing out those most vulnerable. This sentiment is also reflected in HAWNY's 2020 Erie County Homelessness Brief, where it states that "Even with the additional Section 8 vouchers provided by the federal government, homelessness will still be an issue because there are not enough available affordable housing units. Some people are losing their allocated vouchers because they can't find housing." The report goes on to state that one of the main ways to provide housing to those most in need is to "further subsidize the developers with HOME funds and project-based Section 8 vouchers". This is precisely what the ACT HOME Consortium intends to do with HOME-ARP funding and has allocated \$3 million to do so.

## HOME-ARP Production Housing Goals

### Affordable Housing Production Goals

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

With \$3 Million allocated to the development of new affordable rental housing units and an award per unit of roughly \$280,000, the ACT HOME Consortium estimates a creation of approximately 10 new affordable rental units. While the per-unit construction subsidy could be lowered to incentivize additional units, the Consortium planning staff feels that this figure is realistic of the financial requirements new-construction complexes must meet in order to cash-flow the HOME-ARP unit for the life of the 15-year affordability period.

### How Production Goals Address Priority Needs

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:***

Construction subsidies on the creation of new affordable rental housing are anticipated to generate 10 HOME-ARP units, plus be of a sizable nature as to assist in the financial viability of the larger rental complex as a whole. This model is anticipated to generate HOME-ARP unit set-asides, plus other non-HOME-ARP affordable units. The Construction Subsidy program will operate in a similar manner to the HOME Rental Subsidy programs the three Towns operate now, only with more flexibility provided by HOME-ARP regulatory waivers.

Through this same program, the Consortium will also entertain proposals for small in-fill development projects with non-profits that aim to expand programming and services to suburban areas that may better fit their existing clientele. The small projects program area will focus on small 2-4 unit rental complexes provided that they are coupled with the necessary supportive services to operate successfully in a suburban setting (i.e. transportation, childcare, counseling, extended case management).

## Preferences

### Priority Qualifying Populations

**Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:**

The ACT HOME Consortium will not apply preferences for subpopulations of the HOME-ARP qualifying populations.

### Prioritization Method

**If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gaps analysis:**

Not Applicable - The ACT HOME Consortium will not apply preferences for subpopulations of the HOME-ARP qualifying populations.

### Referral Methods

**Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.**

The ACT Home Consortium intends to utilize HOME-ARP funds for the development of rental housing units to serve Qualifying Populations (QPs) as defined in HUD Notice CPD-21-10, including "other populations" as defined in this Allocation Plan. These units will be made available to all QPs and accept referrals through various sources, including the local Coordinated Entry system to identify eligible homeless residents and direct referrals from local non-profits, municipalities and private sources throughout Erie County.

- **If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):**

The Consortium intends to utilize referrals from the local CE process to identify eligible homeless populations. Additional referrals will be accepted to identify other qualifying populations from various public/private sources. The HOME-ARP project grantees will maintain a referral list open to the community and all qualification and eligible applicants will be accepted in chronological order.

- **If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):**



Referrals accepted from the accepted CE process established by the CoC will prioritize eligibility according to the utilized vulnerability index survey referred to as the VI-SPDAT. This survey measures vulnerability and prioritizes those with greatest risk from living on the street. Those determined to have the highest vulnerability, and need for permanent housing, and interested in applying will be identified as eligible and offered the opportunity to apply for housing through the HOME-ARP project.

- ***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Referrals will be coming from multiple sources throughout the community. Since no preferences are identified, HOME-ARP project grantees will maintain a referral list, screen for eligibility, and accept qualifying populations based on chronological order.

#### Limitations in a HOME-ARP Rental Housing or NCS project

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in the Notice:***

The ACT HOME Consortium does not intend to utilize any project limitation or preference.

#### Limitation's Ability to Address Unmet Needs and Gaps

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not Applicable.

#### Ability to Address Other Unmet Needs and Gaps of Other Populations

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not Applicable.

## HOME-ARP Refinancing Guidelines

**According to HUD, if the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including the following:**

The ACT HOME Consortium will not allow the use of HOME-ARP Funds for the refinancing of existing debt secured by multifamily rental housing.

### Minimum Level of Rehab

**Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.**

Not Applicable.

### Review of Management Practices

**Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of service qualified populations for the minimum compliance period can be demonstrated.**

Not Applicable.

### Maintain and/or Create Units

**State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**

Not Applicable.

### Compliance Period

**Specify the required compliance period, whether it is the minimum 15 years or longer.**

Not Applicable.

### Allowable Loan Type

**State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**

Not Applicable.

### Other Requirements

**State other requirements in the PJ's guidelines, if applicable.**

Not Applicable.