

DRAFT

Town of Amherst

**2020-2024 Consolidated Plan and
2020 Annual Action Plan
of the Five-Year Consolidated Plan**

**Community Development Block Grant and
HOME Investment Partnership Grant**

Amherst-Cheektowaga-Tonawanda (ACT) Consortium

**Town of Amherst 2020-2024 Consolidated Plan and 2020 Annual Action Plan
of the Five-Year Consolidated Plan**

Contents

Executive Summary 1

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b) 1

The Process 6

PR-05 Lead & Responsible Agencies - 91.200(b) 6

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)..... 7

PR-15 Citizen Participation - 91.401, 91.105, 91.200(c) 12

Needs Assessment 17

NA-05 Overview 17

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c) 18

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2) 28

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2) 32

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2) 36

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2) 38

NA-35 Public Housing - 91.405, 91.205 (b) 42

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c) 47

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d) 52

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f) 64

Housing Market Analysis 66

MA-05 Overview 66

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2) 68

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a) 73

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a) 81

MA-25 Public And Assisted Housing - 91.410, 91.210(b) 85

MA-30 Homeless Facilities and Services - 91.410, 91.210(c) 87

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d) 91

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e) 96

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f) 97

MA-50 Needs and Market Analysis Discussion	105
Strategic Plan	109
SP-05 Overview	109
SP-10 Geographic Priorities - 91.415, 91.215(a)(1).....	111
SP-25 Priority Needs - 91.415, 91.215(a)(2).....	116
SP-30 Influence of Market Conditions - 91.415, 91.215(b)	124
SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)	125
SP-40 Institutional Delivery Structure - 91.415, 91.215(k).....	127
SP-45 Goals - 91.415, 91.215(a)(4)	132
SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c).....	139
SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h).....	140
SP-60 Homelessness Strategy - 91.415, 91.215(d).....	142
SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)	145
SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)	149
SP-80 Monitoring - 91.230.....	151
Annual Action Plan	153
AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2).....	153
AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e).....	156
AP-35 Projects - 91.420, 91.220(d).....	164
AP-38 Project Summary.....	166
AP-50 Geographic Distribution - 91.420, 91.220(f).....	186
AP-55 Affordable Housing - 91.420, 91.220(g)	187
AP-60 Public Housing - 91.420, 91.220(h).....	189
AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i).....	191
AP-75 Barriers to affordable housing -91.420, 91.220(j).....	194
AP-85 Other Actions - 91.420, 91.220(k).....	197
AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4).....	201

Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Towns of Amherst, Cheektowaga, and Tonawanda are federal entitlement communities under the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) program. The Towns of Amherst, Cheektowaga, and Tonawanda also receive HUD HOME funding through their participation in the Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium. The Town of Amherst acts as the Lead Grantee for the ACT HOME Consortium. In this capacity, the Town of Amherst submits grant applications, executes fund disbursements, and prepares reports on all HOME Investment Partnerships Program funds utilized by the three towns.

In addition to receiving CDBG and HOME funds, the Town of Tonawanda also receives federal Emergency Solutions Grant (ESG) funds.

As HUD entitlement communities, the towns are required to prepare this Five-Year Consolidated Plan (CP) for the aforementioned federal grant programs to guide funding for housing, community development and economic development activities within their communities. This CP covers the period from FY 2020 through FY 2024 (April 1, 2020 to March 31, 2025).

Purpose of the Consolidated Plan

The purpose of the Consolidated Plan (CP) is to guide federal funding investments over the next five years. The CP is guided by three overarching goals that are applied according to a community's needs. The goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low- and moderate- income residents throughout the Consortium, services to support youth, senior, and at-risk populations, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

Focus of the Plan

As required by HUD, the identification of needs and the adoption of strategies to address those needs must focus primarily on low- and moderate-income individuals and households. The CP must also address the needs of special needs populations, e.g., the elderly, persons with disabilities, large families, single parents, homeless individuals and families, and public housing residents.

Structure of the Plan

The Consolidated Plan consists of three major sections: a housing and community development needs assessment, a housing market analysis, and a strategic plan that identifies those priority housing and community development needs and strategies that the Towns will use with the available HUD resources over the next five years. This plan was formulated using HUD's eConPlan tool, which dictates the plan's structure and provides a series of pre-populated tables. Where necessary, HUD-provided tables have been updated or supplemented with more accurate or relevant data.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Strategic Plan provides a framework to address the needs of the Town of Amherst for the next five years using CDBG and HOME funds. The two overarching objectives guiding the proposed activities are:

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

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

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

The overall goal of the CDBG program is the development of viable urban communities that will provide decent housing, a suitable living environment and expanded economic opportunities, principally for low- to- moderate income persons. The main focus of the Town'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, code enforcement, economic development activities and public services.

The Town of Amherst also uses CDBG funds to create a suitable living environment by funding public services that improve the lives of its low-moderate income residents by providing services to seniors,

youth and battered spouses, as well as providing special community policing efforts in target neighborhoods.

An annual Action Plan is prepared each year that identifies specific projects and activities that will be carried-out to address the needs identified in the CP. The Town of Amherst's 2020 Annual Plan includes the following activities: housing rehabilitation, public services, public facilities, acquisition/demolition, housing counseling, assistance to the homeless and persons with disabilities, homebuyer assistance, weatherization, community policing, and economic development. These and other activities are described in more detail throughout this Plan.

3. Evaluation of past performance

The Town of Amherst's past performance in the administration and implementation of the CDBG and HOME programs has fulfilled the spirit and intent of the federal legislation creating these programs. The Town has facilitated affordability for decent housing, availability and accessibility of suitable living environments, sustainability of suitable living environments, and the accessibility of economic opportunities. The following is a summary of the Town's past performance as reported to HUD in the FY2018 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed.

During the 2018 program year, April 1, 2018 through March 31, 2019, the Town of Amherst provided \$496,280 in housing rehabilitation loans to eligible owners of twenty-seven (27) single family homes. This sum includes \$360,511 in CDBG funds, \$66,078 in HOME funds, and \$69,691 in NYS Affordable Housing Corp. matching grant funds expended during this period. Lead paint hazards were remediated from thirteen (13) homes and seven (7) homes were weatherized in Amherst. In Tonawanda, three (3) homes had lead-based paint remediated.

HOME funds were 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. Through an agreement with New Opportunities, a vacant property at 26 Meadow Lea Drive was purchased in 2017 and rehabilitation of the home was completed in the 2018 Program Year. The property was sold to an eligible first-time homebuyer in February 2018. A total of \$211,972 in HOME program funds were spent to acquire and rehabilitate 26 Meadow Lea Drive. In Program Year 2018, New Opportunities also acquired a vacant property at 391 Grover Cleveland Drive and a single-family home will be constructed on the property in the upcoming program year. It will be sold to an eligible first-time homebuyer.

HOME funds were also used to assist six (6) individual first-time homebuyers in purchasing homes in Amherst during the 2018 program year. Assistance is an interest-free deferred loan for closing costs which usually average between \$5,000 and \$8,000 in Amherst.

CDBG funds are also applied to many community services, including fair housing/discrimination assistance, housing counseling and after-school programming. A total of ten (10) homebuyer workshops were held, and eighty-two (82) low- and moderate-income households were assisted with homebuyer counseling. Seventeen (17) people were assisted in homeownership counseling and foreclosure prevention. One hundred and sixty-three (163) people were assisted with fair housing and discrimination concerns. Approximately 59 children were assisted in after school programs. Funds were provided to support the YWCA's work with domestic violence victims, four households were assisted, and to support the Amherst Senior Center to assist individuals with restricted mobility and disabilities.

The Village of Williamsville receives 7% of the Town's Community Development Block Grant allocation and has, over a three-four-year period, focused these funds on the stabilization and rehabilitation of the Historic Meeting House located on Main Street. Work conducted on the Meeting House focused on restoring the exterior historic features of the building, including the windows, brick façade and roof.

4. Summary of citizen participation process and consultation process

The Citizen Participation Plan sets forth the procedures and policies the Towns of Amherst, Cheektowaga, and Tonawanda will use to encourage citizen participation in the development, operation and reporting of their annual Community Development Block Grants, HOME Investment Partnership Grant, and the Consolidated Plan.

Citizens are encouraged to participate in the development of the Consolidated and Annual Plans, any substantial amendments to the Plans, and the Performance Report. Participation by low- and moderate-income persons, including those living in designated CDBG target areas and residents of predominantly low- and moderate-income neighborhoods (as defined by the Federal guidelines), is particularly encouraged, as is the participation of all residents, including seniors, minorities, and persons with disabilities.

Citizen Participation Process

Each town also invites residents of public and assisted housing developments to participate in the process of developing and implementing the Consolidated and Annual Plans. The Towns will provide copies of this Citizen Participation Plan upon request. As an office policy, all members of the community are encouraged to comment on the housing and community development needs in their neighborhoods at any time throughout the year by stopping in the Community Development Department's office located in the Amherst Planning Department within Amherst Town Hall or via email.

In order to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments, the Towns will publish a summary of the proposed Consolidated and Annual Plan and a notice of availability of the document for public review in the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE as a display advertisement at least 30 days prior to its submission to the U.S. Department of Housing and Urban Development. Complete copies of

the proposed Consolidated and Annual Plans will be available online as well as at all Town libraries, the Amherst Planning Department, the Village Clerks' offices in Depew, Sloan, Kenmore and Williamsville, the Town Clerks' offices, and on the Towns' websites. In addition, the Towns will provide a copy of the plan(s) to citizen groups that request it and copies on disk to individuals.

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 Plan alone. Video recordings of Amherst Town Board meetings are also available online through the Town's website.

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 and Consolidated 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 and Consolidated Plan.

The Town requested citizen comments on the 2020-2024 5-Year ACT Consolidated Plan and the 2020 Annual Action Plan, both written or oral, be submitted by January 21, 2020. Written comments were required to be submitted to Amherst Community Development, 5583 Main Street, Williamsville, NY 14221

5. Summary of public comments

A summary of public comments will be added, if applicable, at the end of the public display period.

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

If applicable, a summary of comments not accepted and the reasons for not accepting them will be added at the end of the public display period.

7. Summary

See summaries above.

The Process

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

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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 Community Development Department is the lead agency for the preparation of the Five-Year Consolidated Plan and administration of the CDBG and HOME programs. The Towns of Cheektowaga and Tonawanda serve as Participating Grantees in the ACT HOME Consortium.

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 responsible for the Consolidated Plan process in collaboration with the towns of Cheektowaga and Tonawanda along with the Erie County Consortium. Inquiries related to this Consolidated Plan can be made to:

Laurie Stillwell, Community Development Director/Associate Planner
 Town of Amherst Community Development
 5583 Main Street
 Williamsville, NY, 14221
 email: lstillwell@amherst.ny.us
 phone: (716) 631-7050

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

1. Introduction

The Town of Amherst Community Development Department developed an outreach effort to maximize input from a large cross-section of housing and community development stakeholders. This outreach effort included public meetings, published meeting notices, stakeholder meetings, in-person interviews, and telephone interviews. Furthermore, the Department implements a range of affordable housing and community development activities via collaboration with housing developers and social service agencies. Amherst coordinated its Strategic Plan goals with the goals of numerous local and regional plans. The Town of Amherst coordinates with the Towns of Cheektowaga and Tonawanda and Erie County in the planning and implementation of the Consolidated Plan. The three towns cooperate on initiatives extensively due to their participation in a HOME Consortium.

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 Community Development Department developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, stakeholder meetings, in-person interviews, and telephone interviews. Furthermore, the Department implements a range of affordable housing and community development activities, including administration of the CDBG and HOME programs; preparation of the CP, the Consolidated Annual Performance Evaluation Report (CAPER), and the Annual Plan; technical assistance for and collaboration with non-profit and for-profit housing developers and social service agencies; and rehabilitation and other affordable housing projects.

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

Because homelessness is less concentrated in Amherst and the remainder of the ACT Consortium, it is not as noticeable as it is in the nearby City of Buffalo. No homeless shelters are located within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium. The Homeless Alliance of Western New York manages the CoC within the ACT Consortium. The CoC maintains a rapid re-housing program for the five-county Western New York area. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability. During the development of the Town's 5-Year Consolidated Plan, the Homeless Alliance of Western New York was a significant data source for defining the homelessness issues.

The Town contracts with two HUD-certified housing counseling agencies to provide one-on-one counseling with low-moderate income eligible residents with housing issues who are often at risk of homelessness, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc. Belmont Housing Resources for WNY administers the Sec 8 rental assistance program for all of Erie County (except for City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at the risk of mortgage default or foreclosure.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The Town of Amherst does not receive ESG funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

The Community Development Department actively consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the Town and better allocate entitlement resources. Stakeholder meetings were held with public housing authorities, CBOs and CHDOs, regional agencies, health and human service on June 24, 2019, and affordable special needs housing and homeless assistance providers on June 26, 2019. During the preparation of the Consolidated Plan, the ACT Consortium consulted with many entities, including the following:

- Amherst Senior Services & Outreach
- Amherst Youth & Recreation
- Belmont Housing Resources
- BestSelf Behavioral Health
- Big Brothers Big Sisters
- Bissonette House
- Broadway Filmore NHS
- Buffalo Erie Niagara Land Improvement Corporation
- Buffalo Niagara Association of Realtors
- Buffalo Niagara Partnership
- Catholic Charities of Buffalo
- Cazenovia Recovery Systems
- CCS of Buffalo
- Cheektowaga Community Collaborative
- Cheektowaga Youth & Recreation
- Child and Family Services

- Compass House
- Empire State Development
- Erie County Department of Environment and Planning
- Erie County Department of Health, Office of Environmental Health
- Erie County Department of Mental Health
- Erie County Department of Senior Services
- Erie County Department of Social Services
- Erie County Office for People with Disabilities
- Evergreen Health Services
- FLARE Inc.
- Habitat for Humanity
- Homeless Alliance of WNY
- Lackawanna Community Development Corp.
- Lackawanna Municipal Housing Authority
- My Place Home for Homeless
- Neighbor Legal Services
- New Life Residential Center
- Norstar Development
- Northwest Buffalo Community Center
- NYS Department of Transportation
- People Inc.
- Rental Assistance Corporation
- Restoration Society, Inc.
- Rural Transit Service
- Salvation Army
- Saving Grace Ministries
- Southtowns Rural Preservation Co.
- Town of Hamburg Community Development
- Towns of Amherst, Cheektowaga, Tonawanda
- Tonawanda Housing Authority
- United Way of Buffalo & Erie County
- USDA Rural Development
- West Side NHS
- WNY Independent Living
- Workforce Innovations Board

Table 2– Agencies, groups, organizations who participated

The Town plans to continue this level of engagement with all interested parties beyond the consolidated planning process, enhancing general coordination of the service delivery system throughout the year and for each Annual Plan.

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

There were no types of agencies that the Town did not consult, either through focus group meetings, personal interviews and/or questionnaires.

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?
Town of Amherst 2020 Capital Improvement Program	Town of Amherst	The Strategic Plan takes into consideration projects identified in the Town’s Capital Improvement Program.
2019 Amherst Annual Action Plan	Town of Amherst	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2018 Town of Amherst Consolidated Annual Performance Evaluation Report	Town of Amherst	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
Town of Amherst Economic Study (2016)	Town of Amherst	The Strategic Plan advances recommendations to address public facilities in redevelopment projects.
2007 Bicentennial Comprehensive Plan Amended 2017 and 2019	Town of Amherst	Strategic Plan goals and priorities were developed to be consistent with the Town’s economic action plan focused on economy workforce, and placemaking.
2018 Homelessness Summary Brief	Homeless Alliance of Western New York	The Strategic Plan’s homelessness strategy was developed consistent with the data presented within.
Mid-Term Review for “Opening Doors”: A Community Ten Year Plan to End Homelessness update for Erie, Genesee, Niagara, Orleans and Wyoming Counties	Homeless Alliance of Western New York	The Strategic Plan’s homelessness strategy is consistent with the Continuum of Care recommendations.
2019 Draft Analysis of Impediments to Fair Housing Choice	ACT Consortium, Erie County Consortium	The current goals and strategies to overcome current barriers to fair housing are drawn from this plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2016 Erie County Comprehensive Economic Development Strategy Update	Erie County Industrial Development Agency	The Strategic Plan's economic development strategy is designed to align with and complement the CEDS at the local level
NFTA Light Rail Extension Study	Niagara Frontier Transportation Authority	The goals of the Strategic Plan take into consideration the impact of the NFTA light rail extension.
City of Buffalo Housing Opportunities Strategy	City of Buffalo	The Strategic Plan is consistent with removing financial and public policy barriers to the creation of affordable housing.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The Town of Amherst has coordinated with the Towns of Cheektowaga and Tonawanda in the planning and implementation of the Consolidated Plan. These three towns cooperate on initiatives extensively due to their participation in the ACT HOME Consortium. The Town has also worked with Erie County in the implementation of the Consolidated Plan. This is important as many of the initiatives that must be implemented, such as homelessness prevention and economic development initiatives are regional in scope by nature.

Narrative

The Community Development Department actively consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the Town and better allocate entitlement resources. Stakeholder meetings were held with public housing authorities, CBOs and CHDOs, regional agencies, health and human service on June 24, 2019, and affordable special needs housing and homeless assistance providers on June 26, 2019. In addition, two advertised public hearings took place on October 21, 2019 and January 21, 2020.

PR-15 Citizen 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

The Towns of Amherst, Cheektowaga, and Tonawanda are committed to increasing citizen awareness and involvement in the preparation and implementation of the CDBG, HOME and ESG Programs. Through the citizen participation process, the Town's will become more aware and sensitive to low-and moderate-income citizen's needs and the needs of people with disabilities and the organizations representing persons with disabilities. It will also afford an opportunity to better inform the public of the purpose of the CDBG, ESG and HOME grants and the funding allocation process, and ensure that selected projects are meeting the needs of the Consortium's constituents.

The Town of Amherst's goal for citizen participation is to ensure broad participation of its residents; housing, economic development, and other service providers; local departments; nonprofit organizations; neighborhood groups; and other stakeholders in the planning and implementation of community development and housing programs. The Town, through the ACT HOME Consortium, has laid out a Citizen Participation Plan (CPP) to broaden citizen participation. The purpose of the CPP is to establish the process by which citizens, public agencies, and other interested parties can actively participate in the development of the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), and to set forth the Town's policies and procedures for citizen participation.

Prior to the solicitation and selection of the 2020 projects, a series of meetings were held with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation. A summary table of all the meetings held during the 2020 Consolidated Plan citizen participation process is included on the following page. See the Citizen Participation Appendix for all sign-in sheets, meeting summaries, comment sheets, and summary of community needs survey.

The formal public comment period on the Draft 2020-2024 Consolidated Plan extended from December 20, 2019 to January 21, 2020. A public hearing was held on January 21, 2020 at the regularly scheduled Town Board Meeting to accept and review comments on the draft. All hearings were advertised in the Amherst Bee and posted on Amherst's website.

In accordance with 24 CFR 91.100(4), the Town of Amherst will notify adjacent units of local government of the non-housing community development needs included in its Consolidated Plan.

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
1	Stakeholder Meeting	Public Housing Authorities	A stakeholder meeting was held on June 24, 2019 at 9:00 am at the Delavan Grider Community Center. Representatives of five agencies attended.	Access to public transportation is a must for anyone with Section 8 voucher. Concentration of Section 8 vouchers in small areas of suburbs. Complaints include problem tenants, garbage, maintenance, etc. Language barriers can be a problem. Affordability and availability add to fair housing problem. Need more awareness of Rental Registry with landlords and municipalities. Lack of supply of affordable housing.	All comments were accepted.	
2	Stakeholder Meeting	CBOs/CHDOs	A stakeholder meeting was held on June 24, 2019 at 11:00 am at the Delavan Grider Community Center. Representatives of 15 agencies attended.	Issues with landlords include absentee landlords and zombie properties; failure to maintain properties; refusal to accept Section 8 vouchers. Community resistance to affordable housing persists. There is a need to educate landlords & tenants about fair housing. Difficulty in reaching target population, especially immigrants (language barrier). Inconsistent code enforcement by municipalities is a problem. Affordable housing is an issue in the City and suburbs.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
3	Stakeholder Meeting	Regional Agencies	A stakeholder meeting was held on June 24, 2019 at 1 pm at the Delavan Grider Community Center. Representatives of 11 agencies attended.	Need to increase supply of affordable housing, particularly in areas where jobs are located. Lack of transportation to jobs and services is a problem. Need better access to affordable childcare. Must align workforce training and education with needs of employers, particularly manufacturing jobs requiring math and science skills.	All comments were accepted.	
4	Stakeholder Meeting	Health and Human Services	A stakeholder meeting was held on June 24, 2019 at 3 pm at the Delavan Grider Community Center. Representatives of 11 agencies attended.	Need safe, affordable housing and housing options for those with intellectual and developmental disabilities. Cost and quality of housing is a problem. It is difficult to find staff due to low wages and declining workforce. Lack of transportation affects access to services. Need more resources for housing/emergency shelter for at-risk populations (youth, domestic abuse victims, those with substance abuse or mental health issues) and for homelessness prevention. Need services to teach life skills to youth and adults and to facilitate youth employment. Housing, transportation, access to care and services are issues for seniors.	All comments were accepted.	
5	Stakeholder Meeting	Affordable Special Needs Housing	A stakeholder meeting was held on June 26, 2019 at 9 am at the Belle Center. Eleven agency representatives attended.	Ability of agencies to acquire properties for rehab has been impacted by rising acquisition costs. Rising property values and resulting increases in tax burden have made it	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
6	Stakeholder Meeting	Homeless Assistance Providers	A stakeholder meeting was held on June 26, 2019 at 11 am at the Belle Center. Eleven agency representatives attended.	<p>difficult for low-mod people to access housing market and for existing homeowners to keep homes. People above poverty line are not eligible for assistance. Attracting homebuyers with mixed incomes helps stabilize neighborhoods. Resistance to affordable housing persists.</p> <p>Persons discharged from prison, many of whom are seniors who have had lengthy incarcerations, often have nowhere to go and need housing and support services. Discharge into homelessness is a concern. There is a critical need for affordable housing, particularly for single males and single mothers with children. Concern about equal access and discrimination against LGBTQ populations. Need for social services assistance and crisis housing for youth.</p>	All comments were accepted.	
7	Public Hearing	Non-targeted/broad community	The Town of Amherst held a public hearing on October 21, 2019 to provide information on estimated amount of CDBG and HOME funds available and to obtain views of citizens on housing and community development needs. No	No comments received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
8	Newspaper Ad	All community residents	one attended this hearing. Notice of availability of the FY 2020-FY 2024 Consolidated Plan and the FY 2020 Annual Action Plan for public review and comment was published in the Amherst Bee on 12/18/19 and on the Town's website.	TBD		
9	Public Hearing	Non-targeted/broad community	The Town of Amherst held a public hearing on January 21, 2020 to review and accept comments on the Draft FY 2020-2024 Consolidated Plan.	TBD	N/A	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The needs assessment is based on an analysis of housing problems in the ACT HOME Consortium by income level among renters, owners, and households with special needs. Needs were also identified through a comprehensive public outreach process that included stakeholder meetings, public hearings, and a review process designed to meaningfully engage citizens.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of American Community Survey (ACS) data from the Census Bureau. The CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities, as well as cost burden, which occurs when a household pays more than 30% of its gross income on housing costs. Extreme cost burden occurs when a household pays more than 50% of its gross income on housing costs.

Supplemental data were drawn from the 2011-2015 ACS 5-Year Estimates and other sources to provide additional context when needed.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The Amherst-Cheektowaga-Tonawanda HOME Consortium is comprised of three towns with total population of 285,049. Amherst is the largest of the three towns, representing 43.5% of the Consortium followed by Cheektowaga, 30.8%, and Tonawanda, 25.7%. According to 2013-2017 ACS data the median household income is \$99,080 in Amherst, \$66,323 in Cheektowaga, and \$73,691 in Tonawanda.

Demographics	2010	Most Recent Year: 2015	% Change
Population	283,931	285,049	0.4%
Households	119,048	121,625	2.1%
Median Income*			

Table 5 - Housing Needs Assessment Demographics

**Data on Median Income for the ACT Consortium not reported by HUD*

Amherst is the largest of the three towns, representing 43.5% of the Consortium followed by Cheektowaga, 30.8%, and Tonawanda, 25.7%. As shown in the table below, the percentage distribution for owner and renter occupied units is somewhat similar to the population distribution among the towns. In each of the towns, renter occupied units represent 29-30% of all occupied units in each town.

	Population		Owner Occupied Units		Renter Occupied Units	
	Number	Percent	Number	Percent	Number	Percent
Amherst	124,044	43.5%	34,860	40.7%	14,698	40.9%
Cheektowaga	87,585	30.8%	27,592	32.2%	11,320	31.5%
Tonawanda	73,420	25.7%	23,238	27.1%	9,917	27.6%
Total	285,049	100.0%	85,690	100.0%	35,935	100.0%

Table 6 - Population and Owner/Renter Units

Source: 2011-2015 ACS

In the following Housing Needs Assessment section and throughout the Consolidated Plan there will be various data presentations of housing needs of low- and moderate-income renter households and low- and moderate-income homeowner households. Low- and moderate-income households are those households who have an income that is below 80% of the Area Median Income (AMI).

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	13,210	13,800	18,860	12,365	62,930
Small Family Households	2,915	2,975	4,970	4,075	31,295
Large Family Households	505	370	820	640	4,160
Household contains at least one person 62-74 years of age	2,255	2,880	4,480	2,760	13,459
Household contains at least one person age 75 or older	3,125	5,080	4,665	2,004	5,255
Households with one or more children 6 years old or younger	1,319	1,555	1,913	1,448	3,299

Table 7 - Total Households Table

Data Source: 2011-2015 CHAS

Low and Moderate-Income Renter/Owner Occupied Units

The number of low- and moderate-income renter occupied households and the number of low- and moderate-income owner-occupied housing within the Consortium is almost the same, at 22,160 renter households and 23,725 owner households. However, when expressed as a percentage of households, the predominance of low- and moderate-income individuals within renter households becomes apparent. Since renter households have significantly lower income than owner occupied households, low- and moderate-income renter households represent 62% of all renter households, while only 28% of all owner-occupied household have an income that is below 80% of the Area Median Income.

Comparative renter and owner data is summarized as follows:

- Renter occupied units with households under 80% AMI – 22,160
- Owner occupied units with households under 80% AMI – 23,725
- Renter occupied units under 80% AMI as percent of all renter units – 62%
- Owner occupied units under 80% AMI as percent of all owner units – 28%

Total occupied households with income under 80% of the Area Median Income (AMI) equals 45,885 units out of a total of 121,165. Overall renter households have a lower average income than homeowners and this is reflected in the percent of all renters, 62%, who are low-moderate income. Although the absolute numbers are slightly higher, only 28% of homeowners are low-moderate income.

Cost Burdened Low and Moderate-Income Renter/Owner Occupied Units

HUD defines cost-burdened families as those who pay more than 30% of their income for housing and may have difficulty affording necessities such as food, clothing, transportation, and medical care. Although other housing problems such as substandard or lack of kitchen or plumbing facilities and overcrowding also are identified as housing problems in this report, the overwhelming issue facing low-moderate income household is cost burden.

Renter occupied units under 80% of the AMI and experiencing cost burden totaled 14,617, or 41% of all renter occupied units within the same income category. Owner occupied units under 80% of the AMI and experiencing cost burden total 11,640 households, or 14% of all owner-occupied units within the same income category. The proportional impact on renters was dramatically higher than for owners.

Elderly - Cost Burdened Low and Moderate-Income Renter/Owner Occupied Units

In terms of subcategories, renter units occupied by elderly under 80% of the AMI was reported at 4,723 and for owner occupied units, this number was about one-third higher at 6,207 units. Renter dwelling units occupied by elderly with income below 80% AMI and a housing cost burden of above 30% of income equaled 32% of all renter households experiencing this cost burden. However, the 6,207 owners in this category represented 53% of all owners experiencing a burden in excess of 30% of income for housing cost. Thus, the majority of homeowners in the Consortium communities who are cost-burdened are elderly, a reflection of individuals aging in place within these communities.

- Renter units occupied by elderly under 80% AMI, cost burden >30% - 4,723
- Owner units occupied by elderly under 80% AMI, cost burden >30% - 6,207
- Renter DU occupied by elderly < 80% AMI, cost burden >30% as % of all cost burden >32%
- Owner DU occupied by elderly < 80% AMI, cost burden >30% as % of all cost burden > 53%

Housing Problems

Housing problems are analyzed by renter and owner households. Categories of housing problems include: (1) Substandard Housing - Lacking complete plumbing or kitchen facilities, (2) Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing), (3) Overcrowded - With 1.01-1.5 people per room, (4) Housing cost burden greater than 50% of income, and (5) Housing cost burden greater than 30% of income.

Relatively few units were classified as substandard for overcrowded. As reflected in the tables below, 1,069 low-moderate income households, mostly renters, were reported as having a lack of complete plumbing or kitchen facilities, and a total of 497 households, a majority of which are also renters, were reported as experiencing overcrowding.

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	415	355	175	75	1,020	0	0	49	0	49
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	80	20	25	125	0	0	4	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	115	45	50	20	230	0	60	48	30	138
Housing cost burden greater than 50% of income (and none of the above problems)	5,470	1,945	265	40	7,720	2,810	1,650	870	100	5,430

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	945	2,710	2,390	194	6,239	730	2,520	3,005	1,430	7,685
Zero/negative income (and none of the above problems)	865	0	0	0	865	465	0	0	0	465

Table 8 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	5,985	2,425	515	155	9,080	2,810	1,715	980	130	5,635
Having none of four housing problems	1,930	4,265	6,175	3,345	15,715	1,160	5,400	11,195	8,730	26,485
Household has negative income, but none of the other housing problems	865	0	0	0	865	465	0	0	0	465

Table 9 – Housing Problems 2

Data 2011-2015 CHAS
Source:

	0-30% AMI	30-50% AMI	50-80% AMI	Total
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Renter households	No.	%	No.	%	No.	%	No.	%
Having 1 or more of four housing problems	5,985	76%	2,425	36%	515	8%	8,925	42%
Having none of four housing problems	1,930	24%	4,265	64%	6,175	92%	12,370	58%
Total	7,915	100%	6,690	100%	6,690	100%	21,295	100%
Owner households								
Having 1 or more of four housing problems	2,810	71%	1,715	24%	980	8%	5,505	24%
Having none of four housing problems	1,160	29%	5,400	76%	11,195	92%	17,725	76%
Total	3,970	100%	7,115	100%	12,175	100%	23,230	100%

Table 10 – Housing Problems: One or more severe housing problems, including cost burden >50%
Source: 2011-2015 ACS

Since only a very small percentage of households have substandard conditions or overcrowding, it can be assumed that severe housing cost burden that are in excess of 50% of income is the predominate housing problem facing households identified as “having one or more of four housing problems”.

For renter households that had an income under 30% of Area Median Income, 76% of the households within that category had one or more of the four housing problems, which most likely included a housing expense greater than 50% of income. For owner households, the proportion was similar with 71% of the households within this income range most likely paying more than 50% of income.

For households within 30 to 50% of Area Median Income, 36% of renter households most likely were paying more than 50% of their income for housing. For homeowners within 30-50% of AMI, one quarter were most likely paying more than 50% of their income for housing.

For households within the 50-80% of AMI, the percentage of households that are cost burdened declines to 8% for both renters and for homeowners.

The table below shows estimated number and percent of units lacking complete kitchen facilities, complete plumbing facilities as well as the extent of overcrowding for each town within the Consortium. As indicated previously, substandard housing conditions or overcrowding do not represent a significant portion of the housing problems confronting households in the Consortium communities.

	Amherst		Cheektowaga		Tonawanda	
	Number	Percent	Number	Percent	Number	Percent
Substandard Housing						
Occupied Housing Units	49,558		38,912		32,965	
Lacking complete Kitchen facilities	874	1.76%	1,062	2.73%	674	2.04%
Lacking complete plumbing facilities	386	0.78%	347	0.89%	113	0.34%
Occupants per Room						
1.00 or Less	49,558		38,912		32,965	
1.01 to 1.50 (Overcrowded)	270	0.54%	193	0.50%	177	0.54%
1.51 or more (Severe Overcrowded)	130	0.26%	63	0.16%	87	0.26%

Table 11 – Housing Problems in ACT HOME Consortium

Source: 2011-2015 ACS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,674	1,395	775	3,844	810	825	1,130	2,765
Large Related	320	165	65	550	135	94	260	489
Elderly	2,118	1,670	935	4,723	2,010	2,724	1,473	6,207
Other	2,742	1,729	1,029	5,500	575	570	1,034	2,179
Total need by income	6,854	4,959	2,804	14,617	3,530	4,213	3,897	11,640

Table 12 – Cost Burden > 30%

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,405	370	35	1,810	785	385	240	1,410
Large Related	245	10	0	255	135	25	45	205
Elderly	1,588	1,025	215	2,828	1,410	869	405	2,684
Other	2,564	760	84	3,408	475	370	199	1,044
Total need by income	5,802	2,165	334	8,301	2,805	1,649	889	5,343

Table 13 – Cost Burden > 50%

Data 2011-2015 CHAS

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	110	145	70	0	325	0	60	48	30	138
Multiple, unrelated family households	4	0	0	0	4	0	0	4	0	4
Other, non-family households	0	0	0	45	45	0	0	0	0	0
Total need by income	114	145	70	45	374	0	60	52	30	142

Table 14 – Crowding Information - 1/2

Data 2011-2015 CHAS
Source:

Describe the number and type of single person households in need of housing assistance.

The 40,110 households within the Consortium who are living alone represent one-third of all the households within the ACT Consortium. A review of the data for each of the three towns shows very little variation from the proportions and percentages shown in the above table. Forty-six percent of the single person households living alone are age 65 and over. Seventy-five percent of the single person senior households are female.

Households living alone	Total		Male		Female	
Non-elderly	21,487	53.6%	10,437	69.6%	11,050	44.0%
Age 65 and over	18,623	46.4%	4,566	30.4%	14,057	56.0%
Total living alone	40,110	100.0%	15,003	100.0%	25,107	100.0%

Table 15 – Households Living Alone - ACT Consortium

Source: 2011-2015 ACS

A total of 7,679 “Other” households have a housing cost that is in excess of 30% income. An undetermined number of these households would include single nonelderly persons. In addition, 10,930 elderly households of one or more persons has a housing cost in excess of 30% of income.

Since 62% of the population within the Consortium that is age 65 or more is female and, as indicated in the above table, 75% of the single person households age 65 or more are female, a significant proportion of these households having a housing cost in excess of 30% of income are likely to be occupied by single elderly females.

As shown in MA-10 – Market Analysis – Number of Housing Units, there are 1,834 senior assisted housing units within the Consortium. Also, data provided by Belmont Housing Resources shows 901

voucher holders within the Consortium. Overall, Belmont Housing Resources states that about 62% of voucher holders are seniors. These represent housing resources that address a limited proportion of single person elderly housing needs.

Also, as shown in MA-10, 194 owner occupied units rehabbed by the three Community Development Departments so far under the current Consolidated Plan were occupied by seniors. This number represent 50% of all rehabbed units. For seniors who have aged in placed and need assistance in maintaining their properties, eligible seniors can make an application to this program.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In Erie County, in 2015 there were 42,374 persons living with a disability, comprising 11% of the total noninstitutionalized population. Of this population, 44% were 65 years and older. The most common disability status was ambulatory difficulty, which was experienced by 52% of the disabled population. Thirty-seven percent, 15,838 persons, expressed an independent living difficulty. Thirty percent of the households occupied by a person 65 and over report that they have some type of disability status.

In Erie County, between 2008 and 2018, the incidents of domestic violence reported to law enforcement increased significantly with more than 7,100 reported in 2008 and more than 10,000 reported in 2018.

What are the most common housing problems?

The most common problem experienced by renter households is cost burden in excess of 30% of income. For low-moderate income renter households within the ACT Consortium, 14,617 were cost burdened, including 4,723 who were elderly. For homeowners, 11,640 low-moderate incomes households were cost burdened with housing costs in excess of 30% of income, including 6,207 elderly households.

In addition to cost burden.191 owner households and 1,375 renter households experience at least one type of housing problem, including overcrowding, lack of kitchen facilities and/or lack of bathroom facilities. Lack of complete kitchen or plumbing facilities is the most common physical housing problem for renters. Across income categories, physical housing problems are most common among households in the 0%-30% and 30%-50% of HAMFI category. Overcrowding, with 1.01-1.5 people per room, is the most common for owners.

In sum, many of the ACT Consortium's low-income owner and renter households have housing problems and the Consortium towns address these housing needs through their various residential rehabilitation programs and through the creation of new affordable units.

Are any populations/household types more affected than others by these problems?

On both a percentage and a numerical basis, “other” renter households account for the most cost burdened and severely cost burdened households. Among owner households, the elderly are the most cost burdened and severely cost burdened. There are 5,500 “other” renter households paying more than 30% of income housing costs, accounting for 38% of all cost-burdened households. There are 3,408 “other” households paying more than 50%, representing 41% of severely cost-burdened households. Elderly owner households make up more than half of all cost burdened and severely cost burdened households. The reporting of these statistics is consistent with those reported in the FY2015-2019 Consolidated Plan for the ACT HOME Consortium.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The lack of affordable housing makes it difficult for low-income individuals and families with children to maintain a stable household. No data exists that would specifically enumerate or describe the at-risk or formerly homeless population or rapid-rehousing recipients nearing termination within the Consortium’s jurisdiction.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

No estimate of at-risk populations is available.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The 2016 update to Opening Doors: Buffalo and Erie County Plan to End Homelessness (2012) identifies trends affecting homelessness including high levels of poverty, the distance between low-cost housing and employment opportunities, transportation, lack of affordable housing, and fewer homeless shelters in rural areas compared to their urban counterparts.

The Homeless Alliance for Western New York identified affordable housing as a critical need in Western New York and pointed to the National Low-Income Housing Coalition who estimates a deficit of 30,000 affordable and available rental units at or below extremely low income, and 17,000 units at or below 50% of area median income for the Buffalo-Cheektowaga-Niagara Falls area. Without affordable housing, it is difficult for low-income individuals and families with children to maintain a stable household.

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The tables below indicate, by income level and race or ethnicity, the number of households experiencing one or more of the following four housing problems: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%. Based on American Community Survey (ACS) population estimates for 2017, each of the Consortium communities is predominately white (ranging from 80.6% for the Town of Amherst, to 84.4% for the Town of Cheektowaga, and 90% for the Town of Tonawanda), which explains the higher number of white households at all income levels experiencing one or more housing problems. The subsequent table reflects, by percentage, the number of households within income and racial and ethnic groups which experience one or more housing problems as compared to the population as a whole, indicating where a disproportionately greater need exists.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,465	1,409	1,330
White	8,115	1,234	915
Black / African American	1,110	105	50
Asian	714	30	300
American Indian, Alaska Native	70	0	0
Pacific Islander	0	4	0
Hispanic	254	10	24

Table 16 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,360	4,439	0
White	7,635	4,144	0
Black / African American	920	160	0
Asian	375	10	0
American Indian, Alaska Native	15	4	0
Pacific Islander	0	0	0
Hispanic	325	104	0

Table 17 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,885	11,980	0
White	5,670	10,580	0
Black / African American	740	740	0
Asian	279	289	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	4	0
Hispanic	149	220	0

Table 18 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,899	10,445	0
White	1,779	9,385	0
Black / African American	65	520	0
Asian	10	245	0
American Indian, Alaska Native	0	19	0
Pacific Islander	0	0	0
Hispanic	30	180	0

Table 19 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS

Source:

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Under HUD's definition, a disproportionately greater housing need exists when a racial or ethnic group experiences housing problems at a rate over 10 percentage points higher than that of a corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Area Median Family Income (HAMFI) levels. Where the HUD table below report AMI, they refer to HAMFI. Housing problems include:

Racial/Ethnic Group	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
White	86.8%	64.8%	34.9%	15.9%
Black African/American	91.4%	85.2%	50.0%	11.1%
Asian	96.0%	97.4%	49.2%	3.9%
American Indian/ Alaska Native	100.0%	78.9%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	96.2%	75.8%	40.3%	14.3%
Jurisdiction as a Whole	88.1%	68.1%	36.2%	15.3%
*Cost Burden over 30%				

Table 20 - % Households With One Or More Housing Problems

Source: CHAS 2011-2015

In general, the percentage of households with a housing problem is high for the lowest income bracket (0-30% AMI) and decreases as income increases. According to the above definitions, the racial/ethnic

groups in the Consortium that were disproportionately impacted as having one or more housing problems were:

- Black African American households earning 30-50% AMI and 50-80% AMI
- Asian households earning 30-50% AMI and 50-80% AMI
- American Indian/Alaska Native households earning 0-30% AMI and 30-50% AMI

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The tables below indicate, by income level and race or ethnicity, the number of households experiencing one or more of the following four severe housing problems: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 50%. The subsequent table reflects, by percentage, the number of households within income and racial and ethnic groups which experience one or more housing problems as compared to the population as a whole, indicating where a disproportionately greater need exists.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,795	3,090	1,330
White	6,725	2,625	915
Black / African American	910	310	50
Asian	714	30	300
American Indian, Alaska Native	70	0	0
Pacific Islander	0	4	0
Hispanic	240	24	24

Table 21 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,140	9,665	0
White	3,370	8,410	0
Black / African American	375	700	0
Asian	228	155	0
American Indian, Alaska Native	0	19	0
Pacific Islander	0	0	0
Hispanic	105	330	0

Table 22 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,495	17,370	0
White	1,170	15,070	0
Black / African American	175	1,295	0
Asian	70	494	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	4	0
Hispanic	70	300	0

Table 23 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	285	12,075	0
White	270	10,905	0
Black / African American	0	585	0
Asian	0	250	0
American Indian, Alaska Native	0	19	0
Pacific Islander	0	0	0
Hispanic	15	195	0

Table 24 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS

Source:

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Under HUD's definition, a disproportionately greater housing need exists when a racial or ethnic group experiences housing problems at a rate over 10 percentage points higher than that of a corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing severe housing problems by HUD Area Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI.

Racial/Ethnic Group	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
White	71.9%	28.6%	7.2%	2.4%
Black African/American	74.6%	34.9%	11.9%	0.0%
Asian	96.0%	59.5%	12.4%	0.0%
American Indian/ Alaska Native	100.0%	0.0%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	90.9%	24.1%	18.9%	7.1%
Jurisdiction as a Whole	74.0%	30.0%	7.9%	2.3%

Table 25 – % with one or more severe housing problems, cost burden over 50%
Source: CHAS 2011-2015

In general, the percentage of households with a severe housing problem is highest for the lowest income bracket (0-30% AMI) and decreases as income increases. According to the above definitions, the racial/ethnic groups in the Consortium that were disproportionately impacted as having one or more severe housing problems were:

- Asian households earning 0-30% AMI and 30-50% AMI;
- American Indian/Alaska Native households earning 0-30% AMI; and
- Hispanic households earning 0-30% AMI and 50-80% AMI.

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Under HUD's definition, a disproportionately greater housing need exists when a racial or ethnic group experiences housing problems at a rate over 10 percentage points higher than that of a corresponding income level as a whole. Cost burdened is defined as paying 30-50% of the household income for housing, and severely cost burdened is defined as paying greater than 50% of household income for housing. The table below summarizes the percentage of each racial/ethnic group experiencing cost burden by HUD Area Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	88,870	16,745	14,205	1,390
White	80,010	13,990	11,160	945
Black / African American	3,765	1,605	1,435	65
Asian	2,540	454	920	315
American Indian, Alaska Native	125	15	90	0
Pacific Islander	12	4	0	0
Hispanic	1,665	440	395	24

Table 26 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

According to the above definitions, the following racial/ethnic groups across the Consortium experience cost burden at a disproportionate level:

- Pacific Islanders paying 30- 50% of household income, but this only represents four households.
- Asians households paying more than 50% of income for housing

Racial/Ethnic Group	Less than 30% (No cost burden)	Cost Burden 30-50%	Severe Cost Burden 50% or more	No negative income (not computed)
White	75.4%	13.2%	10.5%	0.9%
Black/African American	54.8%	23.4%	20.9%	1.0%
Asian	60.1%	10.7%	21.8%	7.5%
Amer Indian/Alaska Native	54.3%	6.5%	39.1%	0.0%
Pacific Islander	75.0%	25.0%	0.0%	0.0%
Hispanic	66.0%	17.4%	15.6%	1.0%
Jurisdiction as a Whole	73.3%	13.8%	11.7%	1.1%

Table 27 – % Households Experiencing Cost Burden

Source: CHAS 2011-2015

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The impact of housing problems within the Consortium varies primarily by income level and also by tenure. As shown on the previous tables on disproportionality the following groups within an income tier and race/ethnicity category experienced problems at a rate which was at least 10 percentage point higher than the Consortium as a whole.

Housing Need:

- Black/African American households earning 30-50% AMI and 50-80% AMI
- Asian households earning 30-50% AMI and 50-80% AMI
- American Indian/Alaska Native earning 0-30% AMI and 30-50% AMI

Severe Housing Need:

- Asian households earning 0-30% AMI AND 30-50% AMI
- American Indian/Alaska Native households earning 0-30% AMI
- Hispanic households earning 0-30% AMI and 50-80% AMI

Cost Burden:

- Pacific Islanders paying 30- 50% of household income, but this only represents four households.
- Asians households paying more than 50% of income for housing.

If they have needs not identified above, what are those needs?

In NA-10 Needs Assessment and Housing Market Analysis, needs for various income categories have been evaluated. The number of households on which the above percentages are based is relatively small and their needs are considered as part of the general need's evaluation.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The above table shows the racial/ethnic minorities within the three towns of Consortium. There are an estimated 10,386 Asian persons living in Amherst. The two largest components of this population are Chinese and Asian Indian. A percentage of that number are likely to be students attending the University New York at Buffalo North Campus. The Analysis of Impediments to Fair Housing Choice (2019) identified three census tracts within Amherst with significant concentrations of minority populations. More specifically, these Racially or Ethnically Concentrated Areas (R/ECAs), are defined as areas where

the non-white fraction of the population is more than double the overall non-white fraction of the population in the community. Census tracts 009115 (56.6% non-white) and 009110 (47.0% non-white) are located adjacent to the University at Buffalo’s North Campus. The enrolled student population at University at Buffalo, both undergraduate and graduate, is 47.4% White, 11.7% Asian, 6.27% Black or African American, 5.56% Hispanic or Latino, 1.92% Two or More Races, 0.295% American Indian or Alaska Native, and 0.0762% Native Hawaiian or Other Pacific Islanders.¹

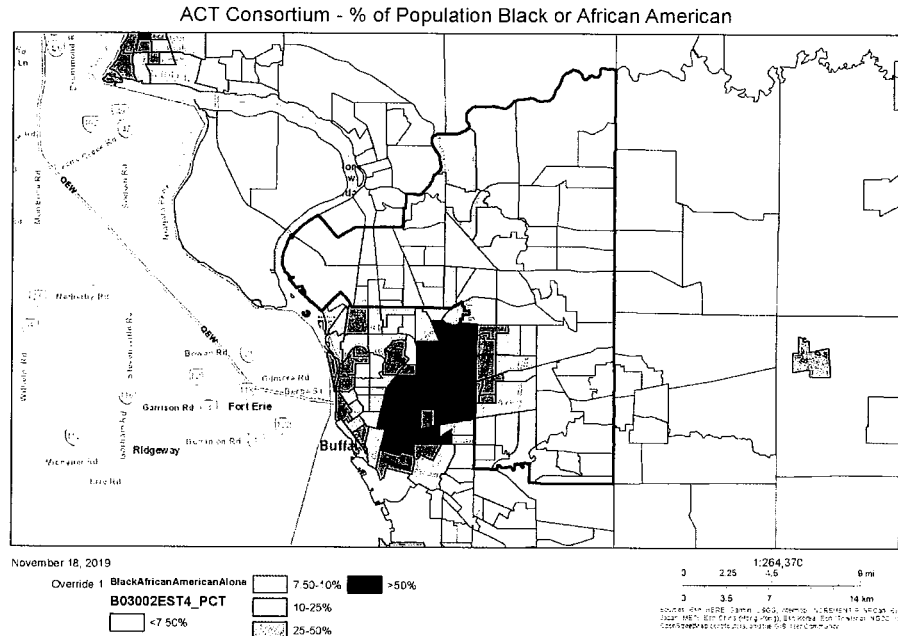
Race/Ethnicity	Amherst		Cheektowaga		Tonawanda	
	Number	Percent	Number	Percent	Number	Percent
Black/African American	7,236	5.9%	8560	9.7%	2,704	3.7%
American Indian	339	0.3%	212	0.2%	193	0.3%
Asian	10,386	8.5%	1,625	1.8%	1,871	2.5%
Hispanic	3,859	3.2%	2,711	3.1%	2,425	3.3%
Total population	122,366	100.0%	88,226	100.0%	73,567	100.0%

Table 28 – Number and % of Population – Race/Ethnicity
Source: 2011-2015 ACS

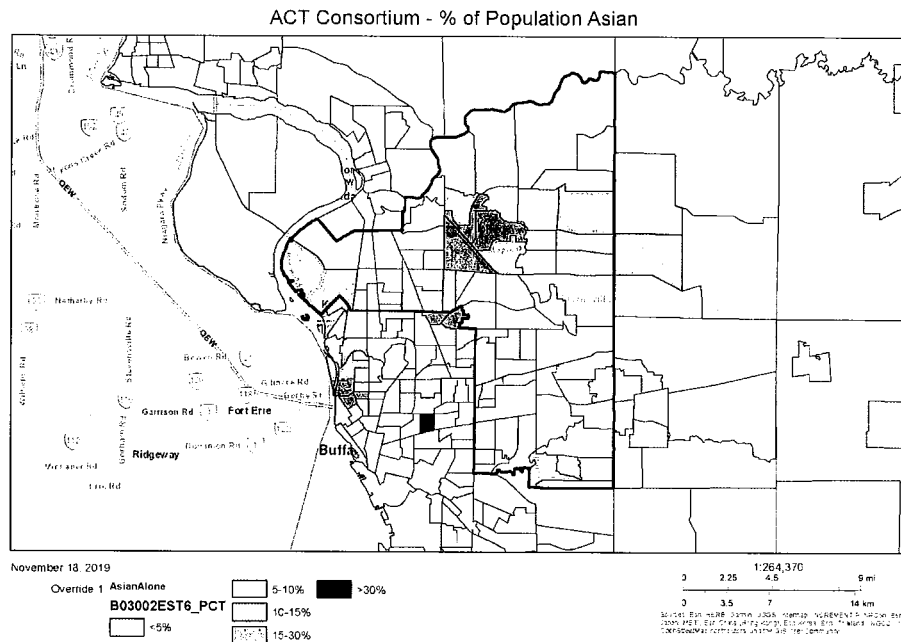
The following maps from HUD’s CPD Maps system illustrates that racial and ethnic minorities in Erie County are concentrated primarily in the City of Buffalo, but also with some degree of integration in Amherst, Cheektowaga and Tonawanda. The ACT Consortium communities are shown within a bold border on the maps.

The largest concentration of Black African American is within the Town of Cheektowaga. As the map shows, Census Tracts bordering on the City of Buffalo have an estimated Black African American concentration of between 25 to 50%. Three of these Census Tracts overlap with Census Tracts within the City of Buffalo. The next highest level of concentration, 10 to 25%, are three adjacent Census Tracts in Cheektowaga and two Census Tracts in the southwest corner of Amherst. Two additional Census Tracts are located within the northwest corner of Amherst. An additional nine Census Tracts with an estimated Black African American population of 7.5 to 10% are scattered among the towns.

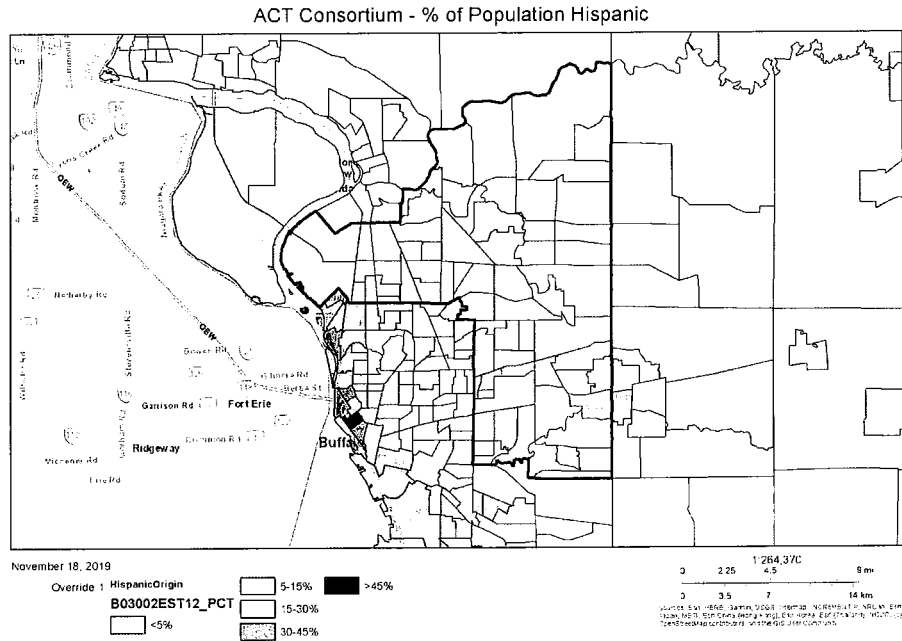
¹ <https://datausa.io/profile/university/university-at-buffalo>



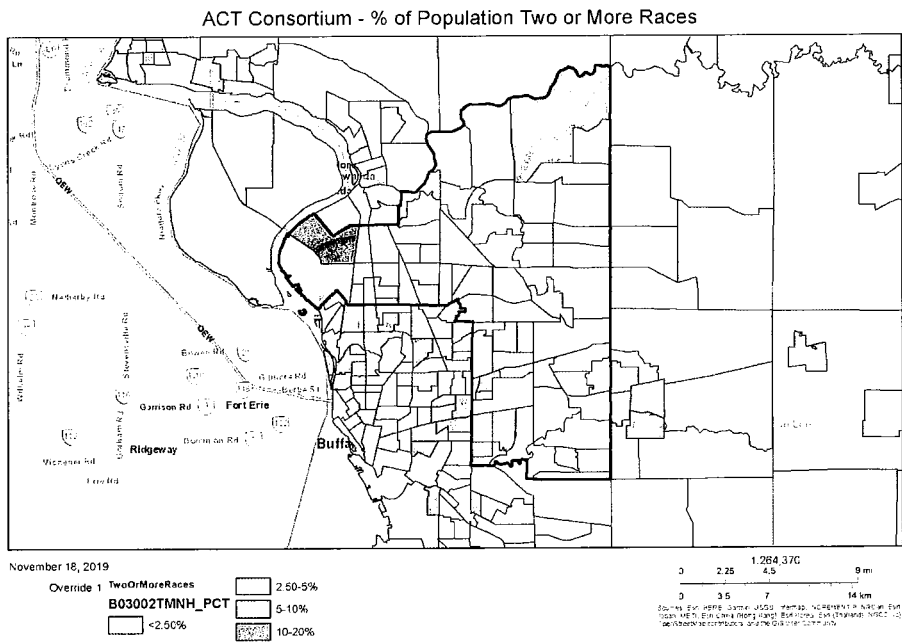
The largest concentration of Asians is within three contiguous Amherst Census Tracts. This concentration is mostly likely due to the significant number of Asian students enrolled at the State University of New York at Buffalo. Of the additional 15 Census Tracts which have an estimated Asian population of between 5 to 15%, twelve are located within the Town of Amherst.



There is no particular concentration of the Hispanic population. Maximum concentration of Hispanics is between 5 to 15% and these are largely scattered among the three ACT towns.



Concentration of Census Tracts containing two or more races is generally within a low percentage range. Only one Census Tract located in northwest Tonawanda had estimated concentration of 10 to 20%. Other estimated concentrations of between 2.50 and 10% were somewhat scattered within the towns.



NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

The towns of Amherst, Cheektowaga, and Tonawanda do not have any public housing developments. However, the Kenmore Housing Authority (KHA) has two developments within the boundaries of the ACT 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.

According to the following HUD-provided tables, Kenmore's clientele is extremely low income. Though 29 households were classified as "disabled," 194 requested accessibility features in their units. Only 10 KHA residents' households were non-White. Additionally, the 2019 Impediments to Fair Housing documents that residents have an average annual income of \$17,078 and that the length of stay is predominantly 5-10 years (29%) and 10-20 Years (27%).

Totals in Use

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *		
# of units vouchers in use	0	0	194	0	0	0	0	0

Table 29 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based		Veterans Affairs Supportive Housing
Average Annual Income	0	0	15,052	0	0	0	0	0
Average length of stay	0	0	5	0	0	0	0	0
Average Household size	0	0	1	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	165	0	0	0	0	0
# of Disabled Families	0	0	29	0	0	0	0	0
# of Families requesting accessibility features	0	0	194	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 30 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				Disabled *	
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
White	0	0	184	0	0	0	0	0	0
Black/African American	0	0	7	0	0	0	0	0	0
Asian	0	0	1	0	0	0	0	0	0
American Indian/Alaska Native	0	0	2	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Table 31 – Race of Public Housing Residents by Program Type

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				Disabled *	
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Hispanic	0	0	2	0	0	0	0	0	0
Not Hispanic	0	0	192	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Table 32 – Ethnicity of Public Housing Residents by Program Type

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As of mid-2019, the Kenmore Housing Authority had 530 applicants on its waiting list. All units administered by the Authority meet ADA standards. Therefore, there is no need to ascertain whether existing tenants or applicants are in need of units which meet ADA standards.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

As indicated above, the Authority has 530 applicants on its waiting list. First preference is given to residents of Kenmore, then the Town of Tonawanda, followed by all others.

There are two Section 8 housing voucher programs in Erie County. Rental Assistance Corporation (RAC) operates in the City of Buffalo and administers about 5,200 vouchers. Belmont Housing Resources administers about 5,500 vouchers. Annual turnover for both programs is approximately 10% per year. For each program, about one-half of the voucher holders have secured housing within the City of Buffalo and the remainder elsewhere in the County.

Data by Census Tract was obtained from Belmont Housing Resources and shows that 920 of the Belmont administered vouchers were utilized within the Amherst-Cheektowaga-Tonawanda Consortium, including 438 in Cheektowaga, 280 in Tonawanda and 183 within Amherst.

Demand for vouchers is very high. After working through its backlog, in early 2019 RAC opened its waiting list for five weeks. During that time period it received 7,000 applications and again closed its waiting list. Belmont Housing Resources has 9,300 applications on its waiting list, which also is closed.

Since the HUD voucher funds that these agencies receive has remained somewhat static and rents for housing units that become available through turnover continue to rise, it is anticipated by each agency that the number of vouchers that can be funded will gradually decline over the next five years.

How do these needs compare to the housing needs of the population at large

The population at large includes many households that share the needs of public housing residents and voucher holders. Resources available to housing authorities and voucher administrators are insufficient to meet local needs. At a stakeholders meeting held in June 2019, Belmont Housing Resources noted that households currently being reached on their waiting list have been there for eight years. Their current waiting list has 9,300 applicants and the waiting list closed in 2011. After working down its waiting list for several years, RAC opened its waiting list for five weeks, received 7,000 applicants, and then closed its waiting list.

Discussion

Due to the fact that current resources and supply are insufficient to meet the existing need, the Town of Amherst is adding programming to support the development of new affordable housing units. Specifically, the Town has developed a Rental Housing Subsidy program utilizing HOME funds to fill the financing gaps that are common in the development of affordable housing units. Belmont Housing Resources for WNY, Inc. recently received a \$300,000 subsidy that, combined with an allocation of Low-Income Housing Tax Credits, leveraged the development of 46 new affordable and accessible housing units on Alberta Drive, in close proximity to shopping and services.

The recently completed Analysis of Impediments to Fair Housing Choice commissioned by the City of Buffalo, Urban County of Erie, Town of Hamburg, and Towns of Amherst, Cheektowaga and Tonawanda, has recommended the Town:

- Increase HOME funding for projects located in higher cost/higher opportunity areas
- Review zoning and land use to expand properties available for higher density / multi-family housing where appropriate
- Expand requirements for number of accessible units included in HOME funded multi-family projects and required “visitability” in all projects of five units or more
- Require affordable units be incorporated into new market-rate projects developed in the Town
- Support regional transit planning and expansion of service to promote access to employment centers and services

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

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 the cities of Buffalo and Niagara Falls and Erie, Niagara, Genesee, Wyoming, and Orleans Counties. The HAWNY publishes reports of homelessness in the five-county region served. The information contained in the reports is obtained from HMIS, departments of social services, and providers. HMIS serves as the primary data source and nearly all agencies in the five-county area who are not on HMIS provide aggregate counts. Increased coverage of HMIS has led to an improved understanding of homelessness. According to the 2018 Homelessness Summary Brief for Erie County, 5,754 people experienced homelessness in 2018. This number is consistent with 2017 but reduced from the 2016 count.

By contrast, HUD requires that every CoC conduct an annual Point in Time (PIT) count of the sheltered and unsheltered homeless in the CoC geographic area during the last ten days of January. Counts are further broken down into subpopulation categories including counts of persons who are chronically homeless, persons with severe mental illness, chronic substance abusers, Veterans, persons with HIV/AIDS, and victims of domestic violence. In Erie County, the January 2019 count located 485 households containing 662 persons predominantly located in emergency shelter and transitional housing. Anecdotal data indicates that the majority of the homeless population in the Buffalo-Niagara region is concentrated in the City of Buffalo.

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	318	129	16	22	485
Total Number of Persons	464	160	16	22	662
Number of Children (under age 18)	140	31			171
Number of Persons (18-24)	29	28		2	59
Number of Persons (over age 24)	291	114	16	20	441

Table 33– Households and Persons Homeless

Source: Homeless Alliance of Western New York – Point in Time Count – Erie County

The HAWNY provided data on the homeless populations in the towns of Amherst, Cheektowaga and Tonawanda. The data is based on zip codes. However, zip code boundaries do not coincide with municipal boundaries. Some zip codes are split between two or more municipalities, and some Cheektowaga and Tonawanda zip codes are shared with the City of Buffalo. Consequently, the homeless population data for zip codes shared with the City of Buffalo skews the homeless population data for Cheektowaga and Tonawanda.

The following 2019 homeless population data for the ACT Consortium towns covers homeless clients who were identified as having lived in the zip codes indicated for each town.

Town of Amherst							
Zip Codes	14051*	14068	14221*	14226	14228	Total	
Count	4	3	24	27	13	71	
Note: Zip codes 14051 and 14221 are shared with the Town of Clarence. For those zip codes unique to Amherst, a total of 43 individuals were reported as experiencing homelessness.							
Town of Cheektowaga							
Zip Codes	14206*	14211*	14215*	14225	14227	14043	Total
Count	137	440	609	58	36	18	1,298
Note: Zip codes 14206, 14211 and 14215 are shared with the City of Buffalo. For those zip codes unique to Cheektowaga, a total of 112 individuals were reported as experiencing homelessness.							
Town of Tonawanda							
Zip Codes	14150		14217		14207*		Total
Count	93		42		251		3876
Note: Zip code 14207 is shared with the City of Buffalo. For those zip codes unique to Tonawanda, a total of 135 individuals were reported as experiencing homelessness.							

Table 34– Number Reported Homeless
Source: Homeless Alliance of Western New York

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

There is no information available to describe the number of persons who become homeless in Amherst, Cheektowaga or Tonawanda, nor the number of days that a person typically remains homeless in these communities. The following information is for the entire Continuum of Care.

According to the 2019 Point-in-Time Count (PIT), there were 31 chronically homeless individuals, none of which were children. Seventeen of the chronically homeless individuals were in emergency shelters, 11 were in a Safe Haven arrangement, and 3 were unsheltered.

There were 54 unaccompanied youth according to the PIT, 52 of whom were sheltered, with two unsheltered, and 11 of whom were under age 18.

There were 74 homeless veterans. Thirty-two were in emergency shelters, 38 were in transitional housing, 3 were in a Safe Haven arrangement, and one was unsheltered. All the homeless veterans counted were single-person households.

There also appears to be a range of situations that may be contributing to homelessness, including physical disabilities, mental health challenges, substance abuse, chronic health conditions, and/or

domestic violence. According to the PIT, 150 adults had a serious mental illness, 74 adults had a substance use disorder, six adults had HIV/AIDS, and 135 adults were survivors of domestic violence.

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Adults with a Serious Mental Illness	89	40	12	9	150
Adults with a Substance Use Disorder	42	22	5	5	74
Adults with HIV/AIDS	3	2	0	1	6
Adult Survivors of Domestic Violence	65	68	2	0	135

Table 35– Additional Homeless Populations

Source: Homeless Alliance of Western New York – Point in Time Count – Erie County

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

There is no data available on these groups in Amherst, Cheektowaga or Tonawanda, nor the number of days that a person typically remains homeless in these communities. The following information is for the entire Continuum of Care.

The 2019 PIT Count identified 252 individuals in 79 homeless families with children. Of the individuals in families with children, 171 were under 18, 28 were between the ages of 18 and 24, and 68 were over the age of 24. No families with children were unsheltered. Six children only households were counted within emergency shelters and transitional housing. No data was available regarding families of veterans within Erie County.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The homeless population within the CoC five-county service area is predominantly Black or African American (49 percent) and White (41 percent). Multiracial individuals accounted for 69 (8 percent) of all homeless persons during the 2019 PIT. In contrast, the racial makeup of Erie County was 82% white and 13% Black or African American according to the 2010 Census. In addition to race, 11% of the homeless population counted identified their ethnicity as Hispanic/Latino. Few respondents identified as other racial ethnic groups.

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	264	103	6	14	387
Black or African-American	320	106	10	16	452
Asian	2	1	0	0	3
American Indian or Alaska Native	7	1	0	2	10
Native Hawaiian or other Pacific Islander	2	1	0	0	3
Multiple Races	51	17	0	1	69

Table 36– Race Homeless Populations

*Source: Homeless Alliance of Western New York – Point in Time Count 1/23/2019
Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC*

	Ethnicity			Unsheltered	Total
	Sheltered				
	Emergency	Transitional	Safe Haven		
Non-Hispanic/Non-Latino	572	208	14	31	825
Hispanic/Latino	74	21	2	2	99

Table 37– Ethnicity of Homeless Populations

*Source: Homeless Alliance of Western New York – Point in Time Count 1/23/2019
Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC*

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2019 Point-in-Time Count, there were 640 sheltered homeless individuals (463 households) and 22 unsheltered homeless individuals (22 households), none of which were children, in Erie County. Of the sheltered homeless reported, 464 individuals (318 households) were counted in emergency shelters and 160 individuals (129 households) resided in transitional housing facilities. Households living in emergency shelters included 250 without children, 64 households with at least one adult and one child, and four households with only children. Households living in transitional housing included 112 households without children, 15 households with at least one adult and one child, and two household with only children.

The Homeless Alliance of Western New York collects data on homeless persons by zip code. The zip code reflects the last address in which the client self-identified as last residing. While the Point in Time count covers Erie and Niagara Counties, this data provides more specific counts for the ACT HOME Consortium geographies. A breakdown of the zip codes in Amherst is presented below:

Town	Zip	Count
Town of Amherst	14068	3
Town of Amherst	14226	27
Town of Amherst	14228	13
Total		43

Table 38– Tonawanda Homeless Populations
Note: Zip code 14207 is shared with the City of Buffalo.
Source: Homeless Alliance of Western New York, 2019

As the data shows, there are 43 homeless persons being served in the three zip codes that are fully or partially within the Town of Amherst.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

In the ACT HOME Consortium, persons who are not homeless but require supportive housing include: elderly; frail elderly; persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; victims of domestic violence, dating violence, sexual assault, and stalking; residents within the refugee community; and youth and young adults. With potential overlap between each of these populations as well as between special populations and the homeless populations, it is essential to address the characteristics and needs of these populations.

Describe the characteristics of special needs populations in your community:

Elderly (defined as 62 and older)

Comprising an estimated 23% of the total population, addressing the needs of those ages 62 and over is a critical consideration in developing a suitable living environment within the communities of the Consortium. In addition, Census data from the American Community Survey (ACS) shows the Consortium is aging, with an increase of 2% in the population ages 62 and over between 2010 and 2015. Therefore, the communities are likely to face growing needs such as accessibility, affordable housing and healthcare as more community members reach this senior status.

	Base Year: 2010	2010 % of Total	Most Recent Year: 2015	2015 % of Total	2010 – 2015 % Change
Total Population	284,159		285,322		0.4%
Population Ages 62 and over	63,185	22%	64,441	23%	2.0%
Population Ages 65 and over	53,226	19%	54,013	19%	1.5%

Table 39– Elderly Population in the ACT HOME Consortium

Sources: 2010 Census Summary File from the Decennial Census; and 2011-2015 American Community Survey 5-Year Estimates.

Housing for the elderly population within the Consortium is characterized by primarily owner-occupied housing units, with 77% of the total housing units for the population 65 and older owner-occupied. In addition, at 52%, over half the householders 65 and older in the Consortium live alone, whereas only 34% of the total householders in the Consortium live alone. Another important consideration for housing and accessibility is that 33% of the civilian noninstitutionalized population 65 and older have a disability status. This status may include hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. The most common disability status of those 65 years and over is ambulatory difficulty. It should also be noted that during the Health and Human Services Stakeholder Meeting in June 2019, representatives identified a growing amount of mental health issues for seniors.

	Population 65 and Over	Total Population
Occupied Housing Units	36,143	121,193
% of Owner-occupied Housing Units	77%	71%
% of Renter-occupied Housing Units	23%	29%
% of Householders Living Alone	52%	34%
Disability Status – With any disability	33%	12%

Table 40– 2015 Social Characteristics of the Elderly Population in the ACT HOME Consortium

Source: 2011-2015 American Community Survey 5-Year Estimates.

Economic data for the elderly population shows that, although there is a smaller percentage of the 65 and older population living below the 100% poverty level than the total population, there is a higher% of the population living at 100 to 149% of the poverty level. According to the 2015 ACS data, income in the past 12 months for the population 65 and older included social security for 93% of the population, retirement for 54% of the population and earnings for 32% of the population. Data for Erie County, as a whole, shows that the mean of earnings at \$46,719 is substantially larger than that of the mean of social security income at \$19,423 or the mean of retirement income at \$20,604. Based on this poverty level data and income data, there is a need for affordability considerations for the elderly population.

	Population 65 and Over	Total Population	Mean Earnings or Income for the Population 65 and Over*	Mean Earnings or Income for the Total Population*
% Below 100% of the Poverty Level	7%	10%		
% 100 to 149% of the Poverty Level	10%	7%		
% At or above 150% of the Poverty Level	83%	83%		
Households – With earnings	32%	74%	\$46,719	\$71,792
Households – With Social Security Income	93%	36%	\$19,423	\$17,923
Households – With Supplemental Security Income	5%	4%	\$9,443	\$9,574
Households – With Cash Public Assistance Income	1%	2%	\$4,256	\$3,769
Households – With Retirement Income	54%	24%	\$20,604	\$21,688
Households – With Food Stamp/SNAP benefits	8%	10%		

Table 41– 2015 Economic Characteristics of the Elderly Population in the ACT HOME Consortium

**In 2015 Inflation-Adjusted Dollars for all of Erie County*

Source: 2011-2015 American Community Survey 5-Year Estimates.

Frail elderly (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework)

Within the Consortium, of the total civilian noninstitutionalized population 65 and older, 7% have a disability status with a self-care difficulty and 15% have a disability status with an independent living difficulty. Therefore, the large majority of the elderly population is able to live independently. Still, as the age group grows, needs of the frail elderly are likely to expand as well. As was discussed during the Health and Human Services Stakeholder Meeting on June 24, 2019 in regards to the elderly population, the frailer the individual becomes, the more issues arise. Preventative care to help keep the elderly population active and healthy is critical.

Persons with mental, physical, and/or developmental disabilities

In 2015 there were 34,623 people living with a disability in the Consortium, comprising 12% of the total civilian noninstitutionalized population. Of this population, 50% were 65 years and older. The most common disability status was an ambulatory difficulty. Types of disabilities where over half the population is 65 years and older include those with hearing difficulty (70%), independent living difficulty (61%), self-care difficulty (59%), ambulatory difficulty (59%), and vision difficulty (53%). For those with cognitive difficulty 16% are under 18 years, 51% are 18 to 64 years and 33% are 65 years and older.

Total civilian noninstitutionalized population with a disability	34,623	12%
By Age Group:		
Under 5 Years of Age	169	0%
Age 5 to 17 Years	2,309	7%
Age 18 to 34 Years	2,893	8%
Age 35 to 64 Years	11,877	34%
Age 65 to 74 Years	5,401	16%
Age 75 Years and Over	11,974	35%
Type of Disability (All ages)		
With a hearing difficulty	10,093	29%
With a vision difficulty	5,426	16%
With a cognitive difficulty	11,198	32%
With an ambulatory difficulty	18,590	54%
With a self-care difficulty	6,606	19%
With an independent living difficulty	13,081	38%

Table 42–2015 Population with a Disability by Age and Type in the ACT HOME Consortium

Source: 2011-2015 American Community Survey 5-Year Estimates.

Economic characteristics of the population with a disability include a larger percentage of the population that is either below 100% of the poverty level or between 100 to 149% of the poverty level than that of the population with no disability. In addition, data for Erie County, as a whole, shows the median earnings for the population with a disability at \$19,927, which is below that of the population without a disability at \$32,014.

	With a Disability	No Disability
Below 100% of the poverty level	16%	8%

100 to 149% of the poverty level	14%	5%
At or above 150% of the poverty level	70%	86%

Table 43–2015 ACT HOME Consortium Poverty Status in the Past 12 Months for the Population Age 16 and over for whom poverty status is determined

Source: 2011-2015 American Community Survey 5-Year Estimates.

Within the Western New York region, according to the New York State Office for People with Developmental Disabilities (OPWDD) enrollment in services as of September 30, 2018 included individuals in a variety of programs, such as housing supports, respite, day habilitation, work-related services, supported employment, self-direction and community habilitation. The following table details the enrollment in each of these programs:

Service	Number of Individuals Enrolled	Individuals New to Service*
OPWDD certified residential programs and individuals receiving Individualized Supports and Services (ISS) housing subsidies. Programs within the certified residential category include: Developmental Centers; Intermediate Care Facilities (ICFs); Individualized Residential Alternative (IRAs); Community Residences (CRs); and Family Care.	8,547	246
OPWDD respite programs. This includes the following types of respite: hourly; overnight; day/evening; and free standing.	6,213	419
OPWDD day habilitation programs.	7,927	271
OPWDD work-related programs including Pathways to Employment; Prevocational Services (both community and site-based); and Sheltered Workshops.	3,894	155
Supported Employment (SEMP) program. SEMP was separated from other employment programs as SEMP focuses on obtaining and maintaining employment, while the other services represent pre-employment supports, which focus on identifying an individual’s interests and skills prior to seeking employment.	2,436	156
OPWDD self-direction program. These individuals have a fiscal intermediary to help support their self-directing. This number does not reflect agency supported self-direction.	1,967	382
OPWDD community habilitation programs.	4,662	463

Table 44– New York State Office for People with Developmental Disabilities (OPWDD) Western New York Region Enrollment in Services (As of September 30, 2018)

**Between April and September of 2018.*

Source: OPWDD (opwdd.ny.gov)

Included in these numbers were 594 individuals that were new to any service between April and September of 2018. The type of service that had the highest number of individuals new to services during this period was community habilitation. This may reflect efforts to provide people with disabilities opportunities to live integrated lives in the community.

Persons with alcohol or other drug addiction

In 2016, with steep rises in opioid related deaths, Erie County Executive Mark Poloncarz declared the opioid epidemic as a public health crisis. Since then the trend has reversed with the number of deaths decreasing substantially since the 2019 high of 301 opioid related deaths. According to the Erie County Commissioner of Health, Dr. Gale Burstein, this decline is a result of both a significant decline in the amount of opioid prescriptions being filled and increased enrollment of individuals who already struggle with opioid addition into medicine assisted treatment plans.²

	2012	2013	2014	2015	2016	2017	2018	2019
Opioid Related Deaths	103	101	127	256	301	251	191	72*

Table 45–2012 – 2019 Opioid Related Deaths in Erie County

*Closed Cases Reported Through September 16, 2019. Note, 47 cases were pending at this time.
Source: Erie County Medical Examiner’s Office

Using demographic data from the Erie County Medical Examiner’s Office and comparing it to United States Census data for Erie County from the 2011-2015 American Community Survey (ACS) 5-Year Estimates, demographic trends in opioid related deaths are highlighted. Analysis of data by gender shows a disproportionate amount of opioid related male deaths to female deaths, with males accounting for 73% of opioid related deaths in 2015. Comparatively, in 2016 males accounted for an estimated 48% of the total population in Erie County. In addition, data regarding race and ethnicity shows that, at 86% in 2015, there is a larger majority of white opioid related deaths than the overall 2015 population majority in Erie County, which estimates the non-Hispanic white population at 77% of the total population. Based on age demographics, the age groups that have a higher percentage of the total deaths than the comparative percentage of the total population in 2015 included the age group from 30 to 39 years at 29% of the total deaths and 11% of the total population in Erie County and the age group from 20 to 29 years at 28% of the total deaths and 15% of the total population in Erie County. Finally, although the City of Buffalo had a higher percentage of the total deaths in 2016 at 44% compared to the total percent of the population at 28%, the breakdown of opioid related deaths by residence shows that opioid related deaths is an issue for the suburban and rural areas of the County as well as the City of Buffalo.

² <https://news.wbfo.org/post/erie-county-sees-light-end-tunnel-opioid-crisis>

	2014		2015		2016		2017		2018		2019*	
	#	%	#	%	#	%	#	%	#	%	#	%
By Gender												
Male	85	67%	187	73%	233	77%	184	73%	133	70%	58	81%
Female	42	33%	69	27%	68	23%	67	27%	58	30%	14	19%
Total	127	100%	256	100%	301	100%	251	100%	191	100%	72	100%
By Race												
White	106	83%	221	86%	246	82%	210	84%	151	79%	61	85%
Black	8	6%	17	7%	28	9%	24	10%	20	10%	6	8%
Hispanic	8	6%	14	5%	20	7%	14	6%	14	7%	2	3%
Other	5	4%	4	2%	7	2%	3	1%	6	3%	3	4%
Total	127	100%	256	100%	301	100%	251	100%	191	100%	72	100%
By Age												
Under 20	N/A	N/A	7	3%	3	1%	9	4%	3	2%	1	1%
20-29	N/A	N/A	72	28%	92	31%	65	26%	55	29%	18	25%
30-39	N/A	N/A	74	29%	86	29%	73	29%	58	30%	18	25%
40-49	N/A	N/A	50	20%	55	18%	44	18%	26	14%	17	24%
50-59	N/A	N/A	39	15%	40	13%	44	18%	33	17%	12	17%
60+	N/A	N/A	14	5%	25	8%	16	6%	16	8%	6	8%
Total	N/A	N/A	256	100%	301	100%	251	100%	191	100%	72	100%
By Residence												
Buffalo	N/A	N/A	N/A	N/A	132	44%	109	43%	85	45%	26	36%
Suburban**	N/A	N/A	N/A	N/A	118	39%	107	43%	72	38%	36	50%
Rural***	N/A	N/A	N/A	N/A	29	10%	25	10%	12	6%	6	8%
Other/Unknown	N/A	N/A	N/A	N/A	22	7%	10	4%	22	12%	4	6%
Total	N/A	N/A	N/A	N/A	301	100%	251	100%	191	100%	72	100%

Table 46–Demographics for 2012 – 2019 Opioid Related Deaths in Erie County

**Closed Cases Reported Through September 16, 2019. Note, 47 cases were pending at this time.*

Source: Erie County Medical Examiner's Office

***Suburban Towns: Amherst, Cheektowaga, Clarence, Grand Island, Hamburg, Lackawanna, Lancaster, Orchard Park, Tonawanda, West Seneca*

****Rural Towns: Alden, Aurora, Colden, Collins, Concord, Eden, Elma, Evans, Gowanda, Holland, Marilla, Newstead, North Collins, Sardinia*

Although data was not available for other types of substance abuse, the Expanded Behavioral Risk Factor Surveillance System (BRFFS) provides some information regarding binge drinking, with an estimated crude rate of 18.6% of the population responding that they engaged in adult binge drinking in the past month during the survey period of April 2013 to March 2014. This number increased to an estimated crude rate of 21.7% based on the 2016 survey that was collected between January 2016 and December 2016.

Victims of domestic violence, dating violence, sexual assault, and stalking

On average, 20 people per minute are victims of physical violence by an intimate partner in the United States.³ In Erie County, between 2008 and 2018, the incidents of domestic violence reported to law enforcement increased significantly with more than 7,100 reported in 2008 and more than 10,000 reported in 2018. According to stakeholders at the Health and Human Services meeting for the Consolidated Plan, victims of domestic abuse may have nowhere else to go, so they end up going back to their abuser and putting their life at risk.

Additional Special Population Needs

In addition to the special populations identified as part of the Consolidated Plan, several populations were discussed during the Stakeholder meetings including Limited English-Speaking Households and the Refugee Community, the youth community, and women and minorities. Providing preventative services and ensuring access to services to these populations as well as to the Asset Limited, Income Constrained, Employed (ALICE) population, is an important consideration in determining supportive housing needs. The following provides some characteristics of the discussed populations.

Limited English-Speaking Households and the Refugee Community

ACS data from 2015 reveals that within the Consortium, 2% or 2,183 households are limited English-speaking households. Of these households, 6% speak Spanish, 59% speak other Indo-European languages, 29% speak Asian and Pacific Island languages, and 7% speak other languages. According to the Erie County Community Health Assessment (CHA) 2017 – 2019, over the last 20 years the City of Buffalo has been a resettlement site for numerous refugee populations. Although the ACT Consortium was not identified as a resettlement site, there may be refugee services needed as new populations enter the region. With potential refugee population needs and a wide variety of languages spoken, there is a demonstrated need to ensure access to services for populations that may have language and cultural barriers.

³ Black MC, Basile KC, Breiding MJ, Smith SG, Walters ML, Merrick MT, Chen J, Stevens MR. The National Intimate Partner and Sexual Violence Survey (NISVS): 2010 Summary Report. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention; 2011.

Youth Community

In 2015, 19% of the total population in the Consortium were children under 18 years of age. For children in households for whom poverty status is determined, 14% were in households where income in the past 12 months was below the poverty level in 2015. According to comments received during stakeholder meetings, the senior population provides an important connection to the youth community as grandparents may be the primary caregiver. According to ACS data, within the Consortium 2% of the population 30 years and over, or 2,834 people, are living with grandchildren. Considerations to ensure youth are receiving needed services include affordability and access.

Women and Minorities

Economic disparities exist within the Consortium across sex, race and ethnicity demographics. The following table details a poverty-level comparison to show economic conditions for women and minorities as compared to the Consortium as a whole. Although the data shows that poverty impacts are widespread, the percentage of the population below the poverty level that are female is higher than the percentage of the population as a whole that is female. Similarly, there are higher percentages of the population that are below the poverty level than there are within the total population for Black or African American, American Indian and Alaska Native, Asian, and Hispanic or Latino origin populations as well as those who are two or more races. These differences are important to understand to ensure all populations are able to access needed services.

ACT	Population Below the Poverty Status		Total Population	
	#	%	#	%
Total Population for whom poverty status is determined	28,396	100%	275,674	100%
By Sex				
Male	12,772	45%	132,063	48%
Female	15,624	55%	143,611	52%
Race and Hispanic or Latino Origin				
White alone	20,020	71%	237,501	86%
Black or African American	3,313	12%	17,624	6%
American Indian and Alaska Native alone	183	1%	710	0%
Asian alone	3,156	11%	12,170	4%
Native Hawaiian and Other Pacific Islander alone	21	0%	77	0%
Some other race alone	403	1%	2,081	1%
Two or more races	1,300	5%	5,511	2%
Hispanic or Latino origin (of any race)	1,987	7%	8,266	3%

Table 47—2015 Population Below the Poverty Status in ACT HOME Consortium By Sex and By Race and Hispanic or Latino Origin

Source: 2011-2015 American Community Survey 5-Year Estimates.

Note: The population that is below the poverty status is in bold when it is a larger percentage than that of the percentage within the total population.

What are the housing and supportive service needs of these populations and how are these needs determined?

Housing and supportive services needs for each of the populations described within this section were discussed during stakeholder meetings of the Consolidated Plan. In the meeting regarding Health and Human Services, needs and issues highlighted included limited housing, coordination of services, staffing difficulties, language and cultural sensitivity, transportation, housing quality and affordability, prevention services, removal of barriers to helping people, education for youth and childcare, senior housing and services and the connection between employment, housing and transportation. This information combined with the characteristics outlined for each population provides insight into the needs of these complex groupings of individuals. The following provides an overview of the needs discussed.

- Additional housing opportunities, specifically for the following populations: elderly, persons with developmental disabilities, homeless transitional youth from 18 to 24 years and for persons coming out of rehab or prison. Issues with existing housing such as affordability, safety, accessibility and quality were also raised during the meeting. Specifically, for people with disabilities, issues of access and affordability are primary challenges to finding housing and there are waiting lists for places that meet the needs of many. In addition, any previous history may cause further difficulty, e.g. prison history, child support payments, etc.
- Prevention of homelessness for those at risk. This is an expressed need particularly for the Asset Limited, Income Constrained, Employed (ALICE) population. It was discussed that although needs are more costly without prevention services, it is difficult to quantify prevention impacts. Stakeholders identified situations where individuals just above the poverty level were not eligible for assistance and end up losing their homes. This illustrates the need for prevention of homelessness in addition to housing those who become homeless. Also identified is the need for life skill training for youth to teach kids the importance of money management, credit scores, paying tickets, etc.
- Coordination of services was identified as a need, particularly for transitional housing. Also identified was the need to support the person rather than the disorder, providing coordination of multiple services to those in need.
- Transportation and access issues were identified for several different populations as a barrier to providing or accessing needed services including primary care and OBGYN services. Specific needs identified included seniors who had lost the ability to drive, individuals who need to conduct housing searches to maintain residency at a housing facility, students eligible for school lunches during summer months, women in need of prenatal care, and employees with off-peak schedules or remote work places.
- Behavioral health services were identified as a common need for the elderly population County-wide. A suggestion raised was the provision of behavioral healthcare on site at senior centers.

- After school programs for youth were identified as limited and focused on behavioral issues and disabilities. For students without behavioral issues or disabilities, programs are even more limited.
- Language and cultural sensitivity training for agencies and organizations is needed to provide support to limited-English speaking populations and refugee populations. Combined training, potentially utilizing webinars, was suggested during the meeting. Also discussed was the need for support and advocacy for refugee populations.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

New York State Department of Health data, provided by the Erie County Department of Health, highlights Countywide characteristics of the population with HIV. In Erie County the number of newly diagnosed HIV cases by year between 2010 and 2017 shows generally declining levels, with 111 new cases in 2010 and 90 new cases in 2017. However, there was an outlier in 2015 with 122 newly diagnosed HIV cases. This time period is around the height of the opioid epidemic, which reached 301 opioid related deaths in 2016. Although the ratio of male to female cases varies from year to year, within this period male cases were between 62% and 76% of the total cases. In 2015, Black Non-Hispanic cases comprised 40% of all newly diagnosed HIV cases and Hispanic cases comprised 20% of all newly diagnosed HIV cases. Comparatively, of the total population in Erie County in 2015 13% were Black Non-Hispanic and 5% were Hispanic.

	2010		2011		2012		2013		2014		2015		2016		2017	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
By Sex																
Male	71	64%	64	62%	73	75%	76	75%	68	76%	93	76%	59	71%	66	73%
Female	40	36%	40	38%	24	25%	25	25%	22	24%	29	24%	24	29%	24	27%
Total	111	100%	104	100%	97	100%	101	100%	90	100%	122	100%	83	100%	90	100%
By Race and Ethnicity																
White Non-Hispanic	N/A	N/A	N/A	N/A	N/A	N/A	39	39%	20	22%	32	26%	21	25%	30	33%
Black Non-Hispanic	N/A	N/A	N/A	N/A	N/A	N/A	35	35%	38	42%	49	40%	42	51%	44	49%
Hispanic	N/A	N/A	N/A	N/A	N/A	N/A	18	18%	19	21%	24	20%	12	14%	9	10%
Other	N/A	N/A	N/A	N/A	N/A	N/A	9	9%	13	14%	17	14%	8	10%	7	8%
Total	N/A	N/A	N/A	N/A	N/A	N/A	101	100%	90	100%	122	100%	83	100%	90	100%

Table 48–2010 - 2017 Number of Newly Diagnosed HIV Cases in Erie County

Source: NYS Department of Health Data Provided by Erie County Health Department

Other characteristics for new HIV cases in the combined years of 2015 to 2017 show that 26% are less than 25 years old, that 14% have documented injection drug use (IDU), and that 85% of the male cases are males who have sex with males (MSM). In addition, data for new HIV cases in Erie County in the combined years of 2015 to 2017 demonstrates that 70% are within 11 zip codes⁴ within the City of Buffalo, although some of the 11 zip codes expand into areas surrounding the City.

Data for all HIV cases in Erie County in 2017 show similar percentages of cases by sex and race as compared to the data for new HIV cases. Data by age shows that 5% of the total HIV cases in Erie County in 2017 are less than 25 years old. In addition, data for all HIV cases in 2017 compared to data for new HIV cases in the combined years of 2015 to 2017 shows a larger percentage (17%) of the total 2017 HIV cases have document IDU and a smaller percentage (77%) of the total 2017 male HIV cases are MSM.

	2017	
	#	%
By Sex		
Male	1,583	69%
Female	701	31%
Total	2,284	100%
By Race and Ethnicity		
White Non-Hispanic	671	29%
Black Non-Hispanic	891	39%
Hispanic	402	18%
Asian/Pacific Islander	40	2%
Native American	0	0%
Multi-Race	280	12%
Unknown	0	0%
Total	2,284	100%
By Age Group		
<13	7	0%
13-19	20	1%
20-24	76	3%
25-29	171	7%
30-39	427	19%
40-49	512	22%
50-59	713	31%
60+	358	16%
Total	2,284	100%
By Risk Group		

⁴ The following 11 Zip Codes for 2017 account for 70% of all New HIV diagnoses in Erie County: 14201, 14206, 14208, 14209, 14211, 14213, 14214, 14215, 14216, 14220, and 14222.

MSM	1,060	46%
IDU	264	12%
MSM/IDU	163	7%
Heterosexual	672	29%
Blood Product	5	0%
Pediatric	36	2%
Unknown	84	4%
Total	2,284	100%

Table 49 - Demographics for All HIV Cases in Erie County in 2017

Source: NYS Department of Health Data Provided by Erie County Health Department

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The Village of Williamsville is home to many historic structures, and many have been given landmark status. The Village has identified the 1907 Section Master's House on the former Rail Yard south of Main Street in the Village as in need of stabilization and preservation services. Additionally, the Village has determined that the Glen Park Nature Center is an under-utilized building that could become an active gathering place as an open-air pavilion within the Glen Park footprint.

The Town of Amherst provides a variety of services from public facilities throughout the Town and is responsible for ongoing maintenance. The Town undergoes a five-year capital planning process to review the physical needs of its facilities.

How were these needs determined?

The Town undergoes a capital planning process to review the physical needs of its facilities. Additionally, maintaining and improving neighborhood assets and connectivity are highlighted in the Town's Comprehensive Land Use Plan. The Plan notes 'public facilities and space are important to civic life and to the visual identity of the community'. The Plan also calls for 'an on-going system to objectively identify community facility and service needs for use in planning and programming by town providers.

The Village of Williamsville took ownership of the Section Master's House and conducted a structural analysis in 2019 through a visible and public process with the involvement of the Village Historic Preservation Committee with an eye toward preserving the Historic Landmark.

Describe the jurisdiction's need for Public Improvements:

Many of the existing sidewalks and ramps throughout the Town are becoming deteriorated due to the weather in the area and the plowing during the winter season and need replacing. Additionally, many Town sidewalks and ramps are not ADA compliant and require upgrades or replacement. Amherst has a need to replace in-accessible sidewalks with ADA compliant ramps within the Eggertsville and Opportunity Zone target areas. Ramps should be installed in conjunction with sidewalk repairs to support mobility, connectivity, safety, and to potentially leverage additional economic development activity. The Town is also Right of Way improvements in low- and moderate-income neighborhoods including signage, benches and beautification efforts.

How were these needs determined?

The Town Comprehensive Land Use and Development Plan features "target capital improvements to leverage private investment and enhance community appearance" as one of the prime objectives.

Additionally, the Town undergoes a capital planning process to review areas in need of physical improvement.

Describe the jurisdiction’s need for Public Services:

Stakeholder meetings have reinforced the existing service delivery needs throughout the Town and the region as a whole. The Town of Amherst is committed to providing services to protect against homelessness, support at-risk individuals, and improve quality of life for residents of all ages and income levels. The Town has specifically identified service needs related to providing safe access to services for the victims of domestic violence, providing residents housing counseling and fair housing services, providing transportation services specifically geared toward the elderly and disabled, and providing programming and recreation facilities for the Town’s youth.

How were these needs determined?

The Consolidated Planning Citizen Participation process included stakeholder meetings with numerous public service providers (see Citizen Participation Appendix) where service delivery needs were addressed. Additionally, the Town’s Comprehensive Land Use Plan called for ‘an on-going system to objectively identify community facility and service needs for use in planning and programming by town providers’ demonstrating the Town’s commitment to continuing to examine the Public Services needed by its residents.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

There are several observations and highlights cited in this Overview that can be gleaned from the subsequent housing sections.

Since 2016, the median price of home sales within Erie County has experienced a significant 24% increase from \$135,000 in 2015 to \$166,900 during the first nine months of 2019. To some degree, this increase correlated with a significant decline in the inventory of homes available for sale from about 6,000 in 2015 to an average of about 3,000 in 2019. From 2009 to 2016, the average annual increase in median sales prices was only 2.6% per year, which is consistent with earlier historical averages.

With fewer homes on the market, information from stakeholder meetings cited anecdotal evidence of more homes, often in the City of Buffalo, being purchased and new owners investing in rehabilitation of the properties. Although increasing home prices is a positive market development, there has been some adverse impact. Habitat for Humanity, for example, cited its experience of having to pay much higher acquisition costs for properties to be rehabilitated. Also, while increasing values are welcome, there is some anecdotal evidence of concern about homeowners being able to afford real estate taxes after reassessments are conducted.

The demand for rental assistance continues to be unabated. Most significant is the number of applications outstanding for vouchers. In 2019, after working down its inventory of applications, the Rental Assistance Corporation in the City of Buffalo opened its waiting list for five weeks, received 7,000 applications, and then shut down its waiting list. As of mid-2019, Belmont Housing Resources has a closed waiting list of 9,300 applicants.

As of October 1, 2019, the State lowered the threshold for remedial action for Elevated Blood Levels (EBL) resulting from lead-based paint hazards from 10mcg/dl down to 5mcg/dl. In 2018, the number of cases requiring investigation and inspection at 10mcg/dl and above was 17 cases within the ACT HOME Consortium, which was far lower than the 433 cases in the City of Buffalo. The lower threshold shows 28 “new confirmed” cases (blood tested but not investigated) in the 5-9mcg range within the ACT HOME Consortium. The new lower threshold will result in a significant increase in the workload for the Department of Health.

Under their respective rehabilitation programs, each of the three towns within the Consortium continues to test all pre-1978 built homes for lead-based paint hazards. Forty-seven percent of the pre-1978 built housing units rehabilitated under the County program tested positive for lead-based paint hazards presence and remedial action was required.

Broadband Access

In 2017, Erie County Broadband Committee commissioned a Broadband Feasibility Study that studied the existing Broadband Infrastructure, identified service gaps, and made recommendations for improving broadband availability. The New York State Broadband Program Office (NYS BPO) defines broadband for the purposes of their grant programs as an Internet delivery service of 100Mbps or better to download Internet content to the user. The NYS BPO relaxes these criteria for remote or rural areas that are challenged for infrastructure and may need to rely on wireless, or mixed technologies of fiber optics and wireless to deliver Internet services. In these special cases an eligible broadband service must support 25Mbps download speeds or better.

There are two predominant broadband service providers in Erie County and the ACT HOME Consortium—Verizon and Spectrum—who offer broadband services to residential and small business customers. Verizon offers digital subscriber lines (DSL) services over their traditional copper plant and high order services across their fiber optic network service called FiOS™. FiOS™ offers plans ranging from 50Mbps to 500Mbps. Verizon’s DSL services do not meet the FCC’s or NYS broadband bandwidth requirement of 25Mbps download speed (source: ECC Technologies Erie County Broadband Feasibility Study)

Verizon and Spectrum service levels vary, depending upon the infrastructure and services available in different parts of the County. The study found that the ACT HOME Consortium communities, and other first ring suburbs, are for the most part well served in terms of access and competition.

The Erie County Broadband Committee is exploring an Open Access Network (OAN) to improve broadband service and is in the process of identifying funding for a Broadband Business Plan.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

Introduction

The housing market within the HOME Consortium consists of more mature suburban towns nearest to the City of Buffalo, with many residents commuting into the City.

Property Type	Number	%
1-unit detached structure	83,130	65%
1-unit, attached structure	3,475	3%
2-4 units	22,584	18%
5-19 units	10,940	9%
20 or more units	6,353	5%
Mobile Home, boat, RV, van, etc	1,275	1%
Total	127,757	100%

Table 50 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Home ownership by type of structure is very similar for all three towns, with 87% or more of homeowners living in single-family detached housing units. For renters, 46.9% live in structures containing five or more units in Amherst and 42.6% in Tonawanda. However, only 28% of renters in Cheektowaga live in structures containing five or more units.

Amherst				
	Owner		Renter	
Category	Number	Percent	Number	Percent
1-detached	30,256	86.8%	1,779	12.1%
1-attached	1,436	4.1%	553	3.8%
2	824	2.4%	2,120	14.4%
3 or 4	619	1.8%	3,358	22.8%
5 to 9	970	2.8%	2,810	19.1%
10 to 19	387	1.1%	920	6.3%
20 to 49	147	0.4%	545	3.7%
50 or more	127	0.4%	2,613	17.8%
Mobile Home, RV	94	0.3%	0	0.0%
Total	34,860	100.0%	14,698	100.0%
Cheektowaga				
	Owner		Renter	
Category	Number	Percent	Number	Percent
1-detached	23,911	86.7%	1,577	13.9%
1-attached	336	1.2%	428	3.8%

2	2,259	8.2%	4,223	37.3%
3 or 4	128	0.5%	1,766	15.6%
5 to 9	74	0.3%	1,191	10.5%
10 to 19	7	0.0%	1,157	10.2%
20 to 49	9	0.0%	223	2.0%
50 or more	0	0.0%	600	5.3%
Mobile Home, RV	868	3.1%	155	1.4%
Total	27,592	100.0%	11,320	100.0%
Tonawanda				
	Owner		Renter	
Category	Number	Percent	Number	Percent
1-detached	21,417	92.1%	1,285	13.6%
1-attached	358	1.5%	261	2.8%
2	1,281	5.5%	2,916	30.8%
3 or 4	41	0.2%	955	10.1%
5 to 9	6	0.0%	1,721	18.2%
10 to 19	0	0.0%	884	9.3%
20 to 49	0	0.0%	305	3.2%
50 or more	10	0.0%	1,123	11.9%
Mobile Home, RV	135	0.6%	25	0.3%
Total	23,248	100.0%	9,475	100.0%

Table 51 – Number of Units
Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	97	0%	1,415	4%
1 bedroom	740	1%	7,805	22%
2 bedrooms	13,600	16%	17,125	48%
3 or more bedrooms	71,260	83%	9,161	26%
Total	85,697	100%	35,506	100%

Table 52 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Belmont Housing Resources maintains an inventory of affordable housing opportunities for Erie County. As shown in the above table, there are 24 assisted housing developments located within the three towns of the ACT Consortium. This inventory consists of a total 3,063 assisted living units, including 1,229 units for families and 1,834 units for seniors. All units are available to households of low- and moderate-income (under 80% of the area median income).

Most of the assisted housing developments charge rent based on 30% of income, while few charge structured rents affordable to low- and moderate-income households. Except for three senior housing developments which are available to households age 55 and over, eligibility for senior housing developments is age 62 and over.

Belmont Housing Resources administers the Section 8 housing voucher program and currently has approximately 5,500 vouchers under contract. Based on Census Tract data provided by Belmont Housing Resources, it was calculated that as of mid-2019, there were 901 households residing in the Consortium towns who were voucher holders. This included 438 in Cheektowaga, 280 in Tonawanda, and 183 in Amherst.

Rehabilitation Category	Total	Amherst	Cheektowaga	Tonawanda*
Total units rehabbed	388	121	155	112
Total rehabbed units built before 1978	379	120	147	112
Rehabbed Units with LBP hazard	179	41	87	51
Pre-1978 units % rehabbed with LBP Hazard	47%	34%	59%	46%
Units rehabbed within target areas	142	49	81	12
Percent units rehabbed within target areas	37%	41%	52%	11%
Rehabbed units occupied by seniors	194	78	63	53
Percent rehabbed units occupied by seniors	50%	64%	41%	47%

Table 53 – Units Rehabilitated under Consolidated Plan 2015 - Mid-2019

**Data for Tonawanda 2015-2018*

All three towns implement homeowner housing rehabilitation programs that provide deferred loans. As shown in the above table, 388 housing units are reported to have been rehabilitated under the current Consolidated Plan period that began in 2015. Each town makes it a priority to service “emergency” applicants first. Overall, 37% of the units rehabbed were within designated target areas, with Cheektowaga having the highest rate at 52%.

Overall, 50% of the units rehabilitated were occupied by seniors. Many seniors age in place, may have reduced income during retirement, and may have difficulty in being able to afford the cost of rehabilitation required to adequately maintain their properties.

Homeowner weatherization needs represent a significant portion of the overall housing rehabilitation needs due to the cold winters, existing cost burdening, and high percentage of elderly ownership, particularly in the older neighborhoods.

Eligible applicants for rehabilitation assistance on the waiting lists are Tonawanda, 50, Cheektowaga, 58, and Amherst, 41.

All units built prior to 1978 are inspected for presence of lead-based paint hazards. Overall 47% of units rehabbed required remediation of lead-based paint hazards. Cheektowaga had the highest percentage, with 59% of units requiring lead-based paint mitigation.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The National Housing Trust maintains a database on expiring project-based rental assistance (PBRA) units, which includes project-based Section 8, Section 202, Section 811, RAP, LIHTC, and HOME units. According to this database, a total of 99 Section 202/811 rental assisted units located within the Amherst-Cheektowaga-Tonawanda HOME Consortium will expire over the next five years.

Because significant government funding has been invested in these properties, these units are some of the most affordable housing in the Consortium. In the absence of intervention to preserve the affordability of these units, they are at-risk for conversion to market rate units once their contracts or affordability periods expire.

Accompanying the database is an explanation that the database was created to provide HUD partners/client with a way of measuring the impact of expiring project-based subsidy contracts in their communities. It represents the most comprehensive picture of project-based subsidies yet developed, but like any “snap-shot”, its usefulness has limits. Although updated weekly, the information does not purport to be complete or all inclusive.

Does the availability of housing units meet the needs of the population?

No. Like most other areas in the nation, the ACT HOME Consortium continues to experience a significant shortage of affordable housing. One critical indicator is the experience of Belmont Housing Resources and the Rental Assistance Corporation (RAC), which currently administer about 11,000 Section 8 vouchers between them. After RAC worked through most of its waiting list, it opened its list for five weeks in 2019. During that time, it received 7,000 applications. RAC then closed its waiting list. In mid-2019, Belmont Housing Resources reported that it had a waiting list of over 9,300 applicants and that it had closed its waiting list. Combined annual turnover for the programs is about 1,000 units per year.

Compounding the problem is a continuing rise in rents in the private market with no increase in total HUD voucher funding. As a result, it is expected that there will be a gradual erosion of the number of vouchers that can be funded as turnover occurs.

At stakeholder meetings, there were several comments citing rising rents in the private sector, and the resulting negative impact on rental housing affordability.

Describe the need for specific types of housing:

Need for housing can be ascertained to some degree by the types of households that are users of the Section 8 vouchers administered by Belmont Housing Resources. Belmont reports that 62% of the households assisted through the Erie County Section 8 program are elderly or disabled, while approximately 33% have a family member younger than 7-years old. It can be assumed that the waiting list reflects similar percentages.

Discussion

Although rehab programs administered by the Community Development Departments in each of the three towns are not large volume producers due to limited funds, sustained effort over a number of years, especially within target areas, can positively impact neighborhood stabilization and leverage additional private investment in home repairs.

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

Wages have not adequately kept up with housing costs in the Consortium. According to HUD, the Fair Market Rent (FMR) in the Consortium for a two-bedroom apartment is \$799. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn \$2,663 monthly or \$31,956 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a “Housing Wage” of \$15.36.

In New York, a minimum wage worker earns an hourly wage of \$11.10. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 55 hours per week, 52 weeks per year.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value			
Median Contract Rent			

Table 54 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

The above Cost of Housing HUD table was not populated. Median home values and median contract rents are shown in subsequent tables by each town, which is more relevant information.

Rent Paid	Number	%
Less than \$500	7,878	22.2%
\$500-999	22,044	62.1%
\$1,000-1,499	4,085	11.5%
\$1,500-1,999	638	1.8%
\$2,000 or more	865	2.4%
Total	35,510	100.1%

Table 55 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 2,075 rental units identified as affordable to households below 30% of HUD Area Median Family Income (HAMFI) represents 6.7% of the rental housing inventory in the Consortium.

Units Affordable to Households Earning	Renter	Owner
30% HAMFI	2,075	No Data
50% HAMFI	8,255	7,384
80% HAMFI	20,650	22,067
100% HAMFI	No Data	31,720
Total	30,980	61,171

Table 56 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	641	660	799	1,002	1,163
High HOME Rent	641	660	799	1,002	1,163
Low HOME Rent	641	660	799	971	1,083

Table 57 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Estimated 2015 median contract rent for Amherst was \$849 and median gross rent was \$958. As shown in the tables below, contract rents and gross rents in Cheektowaga and Tonawanda were about \$200 cheaper.

Amherst				
Rent Range	Contract Rent		Gross Rent	
	Number	Percent	Number	Percent
Less than \$500	1,742	12.4%	1,428	10.1%
\$500-999	7,677	54.5%	6,236	44.3%
\$1,000-1,499	3,341	23.7%	4,333	30.8%
\$1,500-1,999	519	3.7%	1,093	7.8%
\$2,000-2,499	259	1.8%	371	2.6%
\$2,500-2,999	188	1.3%	230	1.6%
\$3,000 or more	348	2.5%	383	2.7%
Total	14,074	100.0%	14,074	100.0%
Median rent	\$849		\$958	
Cheektowaga				
Rent Range	Contract Rent		Gross Rent	
	Number	Percent	Number	Percent
Less than \$500	2,501	23.5%	1172	11.0%
\$500-999	7,574	71.3%	8014	75.4%
\$1,000-1,499	415	3.9%	1261	11.9%
\$1,500-1,999	78	0.7%	114	1.1%
\$2,000-2,499	23	0.2%	14	0.1%

\$2,500-2,999	0	0.0%	16	0.2%
\$3,000 or more	39	0.4%	39	0.4%
Total	10,630	100.0%	10630	100.0%
Median rent	\$634		\$765	
Tonawanda				
	Contract Rent		Gross Rent	
Rent Range	Number	Percent	Number	Percent
Less than \$500	1748	19.6%	1035	11.6%
\$500-999	6806	76.3%	6853	76.9%
\$1,000-1,499	320	3.6%	946	10.6%
\$1,500-1,999	42	0.5%	82	0.9%
\$2,000-2,499	0	0.0%	0	0.0%
\$2,500-2,999	0	0.0%	0	0.0%
\$3,000 or more	0	0.0%	0	0.0%
Total	8916	100.0%	8916	100.0%
Median rent	\$633		\$753	

Table 58 – Contract and Gross Rent

Source: 2011-2015 ACS

Most significant in the gross rent distribution for each of the towns is that in the Town of Amherst, 45.6% of the gross monthly rents paid were \$1,000 or more, while the rates for Cheektowaga and Tonawanda were only 13.6% and 11.5% respectively.

	Amherst		Cheektowaga		Tonawanda	
	Number	Percent	Number	Percent	Number	Percent
Less than 15.0 percent	1,734	12.7%	1,760	16.9%	1,471	16.8%
15.0 to 19.9 percent	1,756	12.9%	1,179	11.3%	986	11.3%
20.0 to 24.9 percent	1,492	10.9%	1,536	14.7%	1,548	17.7%
25.0 to 29.9 percent	1,491	10.9%	1,199	11.5%	880	10.0%
30.0 to 34.9 percent	1,164	8.5%	732	7.0%	802	9.2%
35.0 percent or more	6,019	44.1%	4,030	38.6%	3,077	35.1%
Total	13,656	100.0%	10,436	100.0%	8,764	100.0%

Table 59 – Gross Rent as Percentage of Income

Source: 2011-2015 ACS

The above table shows the percentage of income paid for rent in each of the three towns. Although there is some variation among the towns, 48% of the renter households within the Consortium were paying 30% or more of their income for rent, while almost 40% were paying 35% or more.

Percent of Income	Amherst		Cheektowaga		Tonawanda	
	Number	Percent	Number	Percent	Number	Percent
Less than 20.0 percent	11,648	52.1%	8,054	48.5%	7,619	52.8%
20.0 to 24.9 percent	3,510	15.7%	2,423	14.6%	2,447	17.0%
25.0 to 29.9 percent	2,420	10.8%	1,734	10.4%	1,521	10.5%
30.0 to 34.9 percent	1,215	5.4%	1,165	7.0%	625	4.3%
35.0% or more	3,558	15.9%	3,220	19.4%	2,223	15.4%
Total	22,351	100.0%	16,596	100.0%	14,435	100.0%

Table 60 – Housing Cost for Homeowners with Mortgage

Source: 2011-2015 ACS

63% of homeowners within the Consortium have a mortgage on their properties. Although there is some variation among the towns, for the Consortium as a whole, 22% of homeowners with a mortgage were paying 30% or more of their income for housing. For homeowners without a mortgage (not shown), only 15% were paying 30% or more of their income for housing.

Range of value	Amherst		Cheektowaga		Tonawanda	
	Number	Percent	Number	Percent	Number	Percent
Less than \$50,000	838	2.4%	1,860	6.7%	822	3.5%
\$50,000-99,999	3,295	9.5%	12,178	44.1%	6,060	26.1%
\$100,000-149,999	8,086	23.2%	10,196	37.0%	11,412	49.1%
\$150,000-199,999	8,695	24.9%	2,184	7.9%	3,595	15.5%
\$200,000-299,999	9,499	27.2%	790	2.9%	983	4.2%
\$200,000-499,999	3,564	10.2%	193	0.7%	230	1.0%
\$500,000-999,999	732	2.1%	104	0.4%	81	0.3%
\$1,000,000 or more	151	0.4%	87	0.3%	65	0.3%
Total	34,860	100.0%	27,592	100.0%	23,248	100.0%
Median value	177,400		99,400		117,000	

Table 61 – Value of Owner-Occupied Units

Source: 2011-2015 ACS

Median value of owner-occupied units varies significantly among the towns. Amherst has the highest median value at \$177,400. Median value in Tonawanda is \$117,000 and Cheektowaga is \$99,400.

Only 12% of the owner-occupied units in Amherst are valued at under \$100,000, compared to 51% in Cheektowaga and 30% in Tonawanda.

Year	Median Sales Price
2009	\$118,000
2010	\$125,000
2011	\$125,000
2012	\$130,000
2013	\$132,200
2014	\$132,000
2015	\$135,000
2016	\$139,999
2017	\$150,000
2018	\$160,000
2019*	\$166,900

Table 62 – Erie County Median Sales Price

**Nine months*

Source: BNAR

The above table shows annual median sales prices for Erie County from 2009 through the first nine months of 2019. Although the data is countywide, the ACT Consortium towns likely reflect similar median sales increases.

The Buffalo News reported in September 2019 that, based on Buffalo Niagara Association of Realtors (BNAR) data, the inventory of homes for sale in WNY was in short supply, having declined somewhat dramatically since 2015. As of August 2019, there were 3,165 homes for sale in the Erie-Niagara housing market compared to the historical average since 2000 of 5,000-6,000. The tight market is also reflected by the 24% increase in the median sales price since 2015 as shown in the table above.

Is there sufficient housing for households at all income levels?

The discussion on affordability below demonstrates that there is not sufficient housing at all income levels.

How is affordability of housing likely to change considering changes to home values and/or rents?

	Amherst	Cheektowaga	Tonawanda
Income Range	Percent	Percent	Percent
Under \$10,000	6.8%	4.8%	5.4%
\$10,000-14,999	3.6%	5.1%	5.2%
\$15,000-\$24,999	8.6%	13.2%	12.3%
\$25,000-\$34,999	8.4%	13.4%	12.3%
\$35,000-49,999	12.8%	18.0%	16.8%
\$50,000-\$74,999	16.3%	22.5%	20.4%
\$75,000-99,999	14.2%	13.0%	14.2%
\$100,000-149,999	16.4%	7.8%	9.6%
\$150,000-199,999	6.6%	1.6%	2.4%
\$200,000 or more	6.3%	0.6%	1.4%
Total	100.0%	100.0%	100.0%
Household median income	\$65,439	\$45,893	\$47,871

Table 63 – % of Households

Source: 2011-2015 ACS

Cost burdening for both renters and homeowners, particularly among the elderly, continues to be a problem. Although there are 13,210 renter households within the ACT Consortium earning between 0% and 30% of the median family income, there are only 2,075 renter housing units affordable to households earning 30% of the median income. Data on owner housing is not available, but the number of affordable units priced for households making 30% of median family income would likely not be sufficient to adequately address this housing gap.

A total of 14,617 renter households earning under 80% of the median income are cost burdened. As a subset of that category, there are a total of 10,384 households, both renters (6,854) and owners (3,530) paying more than 30% of their income for housing costs and have an income under 30% of the Area Median Family Income. The data also shows that elderly households are particularly cost burdened. Of the 4,128 elderly households with an income under 30% of the area median income who are cost burdened, 49% are homeowners. This is likely the result of a high number of elderly households who have aged in place while on fixed incomes.

The table below shows that median home values from 2012-2015 increased modestly in the ACT towns from 2.9% to 5.2%, while the BNAR data reflects the dramatic increase from 2015-2018 of 18.5%.

Increases in the prices of homes sold was cited by several persons at a stakeholders meeting. In particular, comments by the Executive Director for Habitat for Humanity summarized some of the issues currently encountered by organizations attempting to provide housing for low- and moderate-income households. A few years ago, Habitat for Humanity occasionally received donated property and could acquire vacant lots, particularly in Buffalo, for \$1 and often bought homes at auction for \$500, subject to

payment of back taxes on the properties. This made it economically feasible for the organization to build new or rehabilitate properties. However, with increased upfront acquisition costs, former development or rehabilitation opportunities are now beyond the reach of Habitat. Similar observations were stated by other stakeholders.

In an attempt to operate within current market conditions, the Executive Director of Habitat for Humanity took the initiative to create an informal partnership of 12 organizations that collaborate on housing opportunities.

	Amherst			Cheektowaga			Tonawanda		
	2012	2015	% Change	2012	2015	% Change	2012	2015	% Change
Median Homes Value	168,700	177,400	5.2%	96,600	99,400	2.9%	111,900	117,000	4.6%
Median Contract Rent	795	849	6.8%	609	634	4.1%	596	633	6.2%

Table 64 – Median Home Value and Contract Rent
Source: 2011-2015 ACS and 2015-2019 Consolidated Plan

The above table shows median contract rents have increased in each of the ACT towns between 4.1% and 6.8%. Although no data is available regarding current median contract rents and rate of change, feedback from stakeholder meetings held in mid-2019 suggest that rents have been increasing at a faster rate than in the past. This is further confirmed by representatives from Belmont Housing Resources and Rental Assistance Corporations, who at the stakeholders meeting indicated that as turnover has occurred in their voucher programs, increasing rents in the marketplace are resulting in higher costs per voucher.

Another observation at a stakeholders meeting was that cost of construction in the Buffalo area is high, yet the average rent is below other metro areas, making affordable housing difficult to develop. Further, it was noted that use of incentives could help to mitigate these conditions.

The combination of an extremely tight housing market and rising home prices has made access to homeownership for low-income families within the ACT Consortium extremely difficult. That lack of access is exemplified by the high cost-burdening statistics for homeowners. The problem is most critical in the Town of Amherst, where home prices are significantly higher on the average than in the Towns of Tonawanda and Cheektowaga.

How do HOME rents / Fair Market Rent compare to Area Median Rent?

The area HOME/Fair Market Rents are \$660 for a one-bedroom unit and \$799 for a two-bedroom unit. The median gross rent for Amherst as shown in the table above, which reflects predominantly one- and two-bedroom units, is estimated at \$958, which far exceeds both the one (\$660) and two (\$799) bedroom HOME/Fair Market Rents. The median gross rents for Cheektowaga (\$765) and Tonawanda (\$753) are close to the HOME/Fair Market Rents.

How might this impact your strategy to produce or preserve affordable housing?

It is a continuing goal of the ACT Consortium to produce and preserve affordable housing. The development of a substantial number of market rate rental units in the City of Buffalo, many through adaptive reuse projects that utilized historic tax credits, has freed up existing rental units in the suburban towns. As a result, incentives to maintain and rehabilitate existing properties may be more productive and cost effective than new construction for creating or maintaining affordable rental housing in the ACT communities.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

The following data provides an overview on the condition of housing in the ACT Consortium.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":

Standard Condition: No major structural defects, adequate plumbing and kitchen facilities, appearance which does not create a blighting influence, and the house meets additional, more stringent, local standards, and building codes, including lead-based paint clearance.

Substandard housing: A unit is substandard if it: is dilapidated, does not have operable indoor plumbing, does not have a usable flush toilet inside the unit for the exclusive use of a family, does not have a usable bathtub or shower inside the unit for the exclusive use of a family, does not have electricity, or has inadequate or unsafe electrical service, does not have a safe or adequate source of heat, should, but does not, have a kitchen; or has been declared unfit for habitation by an agency or unit of government.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition makes rehabilitation both financially and structurally feasible.

Housing Conditions: Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards

Condition of Units

The following table indicates the number of housing units by tenure that experience housing conditions as defined above. Renter units have a significantly higher prevalence of housing units with at least one selected condition, with 43% of renter-occupied units in the Consortium having at least one selected condition compared to only 19% of owner-occupied housing units. Very few owner- or renter-occupied units have more than one condition. Based on information presented under NA-10 – Needs Assessment, the predominate condition experienced by households is having a housing cost which is in excess of 30% of income.

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	15,870	19%	15,085	43%
With two selected Conditions	122	0%	890	3%
With three selected Conditions	15	0%	104	0%
With four selected Conditions	0	0%	0	0%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
No selected Conditions	69,685	81%	19,415	55%
Total	85,692	100%	35,494	101%

Table 65 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,508	3%	2,615	7%
1980-1999	10,425	12%	6,345	18%
1950-1979	51,340	60%	17,614	50%
Before 1950	21,420	25%	8,908	25%
Total	85,693	100%	35,482	100%

Table 66 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	72,760	85%	26,522	75%
Housing Units build before 1980 with children present	2,444	3%	1,489	4%

Table 67 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 68 - Vacant Units

*Data not reported by HUD

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

No information is available on the condition of 3,535 “other vacant” units within the Consortium and whether they are suitable for rehabilitation. As reported in NA-10 Needs Assessment, only a very small percentage of housing units are substandard in that they lack complete kitchen facilities or lack complete plumbing. The most available measure of units which need rehabilitation are the eligible applicants that each town Community Development Department receives for rehabilitation assistance.

Estimate the number of housing units within the jurisdiction that are occupied by low-or moderate-income families that contain lead-based paint hazards. 91.205(e), 91.405

The sum of the occupied units within the Consortium that were built prior to 1980 is 96,293 and those built prior to 1978 are considered at risk for containing lead-based paint. Without a sample of homes built prior to 1978, it is difficult to estimate the number of units having lead-based paint hazards. If properties are sufficiently maintained and paint is not disturbed, the presence of lead-based paint is not likely to be a risk hazard. What can be measured to some degree is the incidence of lead-based paint hazards that have been reported.

	Amherst		Cheektowaga		Tonawanda	
	Owner	Renter	Owner	Renter	Owner	Renter
Built Pre-1980	25,102	9,392	25,027	6,364	22,629	7,779
Percent low-mod occupied*	25%	55%	25%	55%	25%	55%
Est. Low-Mod Occupied	6,275	5,166	6,256	3500	5,657	4278
Est. % risk of LBP hazard**	12%	20%	12%	20%	12%	20%
Est. Low-Mod Occupied at risk	753	1033	750	700	678	855

Table 69 - Estimate of Units at Risk with Lead-Based Paint Hazards

**Consortium - Assume renter- 55%, owner 25%*

***Assumption of higher potential hazard for renters than owners*

Since renters overall have lower incomes than homeowners, it is assumed that approximately 55% of renters (12,944) are low- or moderate-income and the homeowner percentage is estimated at 25%, or 18,188 households.

On average, homeowners tend to have an interest and incentive to maintain their properties, which is likely to result in a smaller percentage of such households having the potential presence of lead-based paint hazards. It is assumed that 12 %of low- or moderate-income homeowners could have the potential presence of lead-based paint hazards and renters would have a higher percentage, estimated at 20%.

Data is available for the actual number of elevated blood level cases investigated and inspected and number of new confirmed cases. Prior to October 2019, the threshold level for environmental investigations and inspection referrals for elevated blood level (EBL) was 10mcg/dl level or higher. As shown in the table below, in 2018 there were 17 cases within the Consortium towns which were investigated and inspected. Also, in 2018 there nine newly confirmed cases within the Consortium which were at the 10mcg/dl level or above.

As of October 1, 2019, the State lowered the elevated blood level (EBL) threshold level requiring investigation to 5mcg/dl and above. In 2018, the number of new confirmed cases with BLL 5-9mcg/dl range was reported at 28 within the Consortium. All new confirmed cases >5-9mcg/dL will result in full environmental investigation and medical follow up until child’s BLL is confirmed below 5 mcg/dl.

By comparison, the City of Buffalo, which has a much older housing stock, had 433 cases in 2018 that were subject to environmental investigation/inspection referrals for elevated blood levels and 357 cases which fell within the new lowered state threshold.

Category	Total	Amherst	Cheektowaga	Tonawanda
Investigation/Inspection Unit Referrals for EBL made in 2018	17	3	6	8
2018 New Confirmed Cases with BLL 10mcg/dl or higher	9	0	3	6
2018 New Confirmed Cases within BLL 5-9mcg/dl*	28	5	7	16

Table 70 - Elevated Blood Levels

**Based on lower State threshold effective October 1, 2019*

Source: Erie County Department of Health

When compared to Buffalo, the lower incidence of findings of elevated blood levels within the Consortium is likely due to the time frame in which housing was built prior to 1980. Unlike the City of Buffalo where most of the housing supply was built prior to 1940, within the Consortium 69% of the occupied housing built prior to 1980 were built between 1950 and 1980. These are post-World War II housing units that are more likely to have been maintained over time and less likely to have findings of lead-based paint hazards unless the paint has been disturbed or subject to neglected maintenance.

Another measure of the incidence of lead-based paint hazards is the experience of the Community Development Departments of each town in administering their home rehabilitation programs. As shown in the table under MA-10 – Market Analysis – Number of Housing Units, overall 47% of the pre-1978 housing units rehabilitated required mitigation of lead-based paint hazards. The percentages varied with Cheektowaga at the highest with 59%, Tonawanda with 49%, and Amherst the lowest with 34%. Therefore, even for housing units built prior to 1978 that qualified for rehabilitation, slightly less than one-half required lead-based paint hazard remediation. Each town hires an outside company to perform the Lead-Based Paint Assessment as well as the Lead-Based Paint Clearance Tests/Reports.

Discussion

The number of lead-based paint hazards that require remediation as reported by the Erie County Department of Health is relatively small within the Consortium. All homes built prior to 1978 for which eligible applications are made for rehabilitation assistance are inspected for the presence of lead-based paint hazards and appropriate remediation is undertaken when needed.

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
						Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
# of units vouchers available			200						
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 71 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The Kenmore Housing Authority (KHA) owns and operates two senior citizens housing developments, Kenmore Village Apartments and Theaters Apartments. The apartments are next to each other on one site and each contains 97 units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

During the 2015-2019 time period, the KHA undertook modernization projects that totaled \$1.1 million and included 10 projects. The largest project was a complete bathroom renovation project at a cost of \$514,000. A total of \$303,000 was spent to replacing 400 windows at the Theater project. Six parking spaces were added at the Kenmore Village Apartments, bringing the total to 35 spaces.

Another amenity, particularly appreciated by the tenants, is personal security via 15 security cameras located in both projects, which can be monitored from the office on TV screens. Also, any visitor in the lobby who is calling apartments can be seen by the tenant on their TV.

Public Housing Condition

Public Housing Development	Average Inspection Score
HUD Inspection 2018	91

Table 72 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

For 2020, the Authority has programmed \$350,000 for elevator modernization in the Kenmore Village Apartments. The project primarily involves upgrading and replacement of the mechanical operations of the elevator system as it has become increasingly difficult to obtain replacement parts in a timely manner when there is a breakdown. The next major project will be using \$250,000 to replace kitchen cabinets and counter tops in the Theater project.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The most important project going forward to improve the living environment will be the modernization of the mechanical system for the elevator in the Kenmore Village Apartments, which will assure continual operation without breakdowns. The addition of six parking spaces for the Kenmore Village Apartments has addressed a critical need.

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

Stakeholders interviewed revealed that poverty is a leading cause of homelessness in the ACT Consortium, and that there are high numbers of persons living in poverty in the ACT Consortium. However, because poverty is not as concentrated as in the nearby City of Buffalo, it is often less noticeable. No homeless shelters are located within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium.

Community Development staff in the Consortium's towns have participated in the Prism Project Forum and Point in Time Count to survey the homeless and help to create a data base of services utilized by the chronically homeless. These projects, sponsored by the Homeless Alliance of Western New York, have produced a Ten-Year Action Plan (Opening Doors: Buffalo and Erie County Plan to End Homelessness (2012) for the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless, permanent housing for clients dealing with mental health and/or substance abuse issues. The 2016 update to the Opening Doors document identifies other trends affecting rural homelessness include high levels of poverty, the distance between low-cost housing and employment opportunities, transportation, lack of affordable housing, and fewer homeless shelters than their urban counterparts.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are many social service agencies working in Erie County and throughout Western New York that provide benefits to very low and low-income individuals and families in order to address the needs of homeless persons. These organizations provide many services to homeless or at-risk residents, including, but not limited to, life skills, alcohol and drug abuse treatment, mental health treatment, AIDS related treatment, education, employment assistance, childcare, transportation, counseling, parenting classes, and housing placement/assistance. The HAWNY identifies more than 60 partner agencies providing various services to the homeless populations within Erie County.

Several programs assist with transportation or bus tokens to individuals searching for housing, commuting to the workplace, or receiving services. These programs include the Erie County Department of Social Services Welfare Division, Medicaid Transportation, and the Independent Living Center. The Erie County Department of Social Services also offers a bus. Additionally, Child and Family Services operates a "Wheels to Work" program which grants small loans for the purchase of a vehicle. The Wheels to Work program has been highly successful and to date has made hundreds of loans providing individuals the opportunity to access employment by providing transportation to jobs off regular bus routes and during public transportation off hours.

Physical and mental health care providers in the area include:

- Crisis Services Street Outreach Program, Lake Shore Behavioral Health Homeless Services, and Harbor House staff members conduct mental health screenings and assessments for low-income persons frequenting area soup kitchens and the area drop-in center.
- The Matt Urban Center’s Street Outreach workers, while not making direct physical and mental health assessments, is able to make referrals to those agencies that do and provide access to some of the hardest to reach homeless and at-risk families and individuals.
- Cazenovia Recovery Systems provides assessments of chemically addicted individuals through regularly scheduled visits to emergency facilities.
- The Planned Parenthood of Buffalo and Erie County Mobile Outreach Unit screens clients for sexually transmitted diseases and other medical needs.
- The Veterans’ Administration Health Care for the Homeless Program provides medical/psychiatric assessment and treatment to homeless veterans being served in dining rooms and Harbor House.
- The Erie County Health Department’s Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies. The Community Health Center also does medical assessments of low-income individuals in the community.
- Detoxification services for alcohol and substance abuse are available through Erie County Medical Center, Buffalo General Hospital, Alcohol and Drug Dependency Services, Stutzman Treatment Center, and Cazenovia Recovery Systems.

A small number of local agencies provide small loans for the necessary household expenses including heat and utilities. These funds are available through Child and Family Services, Catholic Charities, Home Energy Assistance Program, National Fuel Advocates, American Red Cross, Belmont Housing Resources of WNY –Self-Sufficiency Program, Buffalo Urban League, and Community Action Organization. The Minority Women Business Entrepreneurs Loan provides funds for starting a home business.

Various organizations offer educational and vocational training for low-income populations. These programs include GED or certificate programs, specific skill development, resume writing, interview training, and assistance with locating jobs through job boards and referrals. Programs include:

- Buffalo Employment Training Service
- Buffalo General Hospital
- Buffalo Opportunity Services
- Buffalo Urban League Answer Program
- Buffalo Urban League Employment Program
- Buffalo Urban League Multi-Service Center
- Educational Opportunity Center
- Employment and Service Center
- Everywoman Opportunity Centers
- Greater Buffalo Works Program

- Veterans Multi-Purpose
- Vocational and Educational Services for Individuals with Disabilities
- Vocational Training Center
- Workforce Investment Board

Through collaboration with Neighborhood Legal Service and University at Buffalo Law School, the Homeless Task Force provides legal assistance and referrals to homeless and near-homeless populations. By traveling to dining facilities, the Task Force can overcome many of the obstacles people face when attempting to obtain legal assistance. In many cases, program personnel can steer clients to benefit programs or other areas that may help lift clients out of their present situation. This team works with high risk sub-populations and is integral in establishing trust in the system, which is sometimes lacking among homeless and near homeless persons. Legal Services for low-income individuals and families are also provided through:

- The Public Defender's Office
- Law Guardian
- Action for Mental Health
- Legal Advocacy for Disabled Individuals
- Legal Aid
- Legal Action
- University at Buffalo Law Students
- Western New York Law Center
- Project Dandelion through Neighborhood Legal Services
- Legal Services for the Elderly and Disadvantaged

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Facilities provide specialized assistance to chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, but many service providers work with multiple homeless subpopulations rather than one specific population. Police departments in the Consortium and administrators of hospital emergency rooms work together to identify the homeless, assess their needs, and refer them to appropriate agencies. Within the Consortium there are a number of facilities that meet the needs of homeless persons.

The following is a list of emergency shelters as identified in the HAWNY Guide to Buffalo and Erie County Community Services: Back to Basics (men only), Buffalo City Mission (adult males), Compass House (12-17 year-olds), Cornerstone Manor (single women/families), Family Promise of WNY (families), Haven House (victims of domestic violence), Hope House (women and children/families), Little Portion Friary

(adult males/females), Salvation Army (families/single women), St. Luke's Mission of Mercy (adult males), and Temple of Christ My Place Home (women and children/families).

Other organizations and facilities meeting the needs of the homeless population include: Matt Urban Hope Center (adult males/females -chronically homeless), BestSelf Behavioral Health, Cazenovia Recovery Systems, Evergreen Health Services, Gerard Place, Living Opportunities of DePaul, Restoration Society, Spectrum Human Services, Transitional Services Inc., Veterans LifeOPS, Catholic Charities, Hispanos Unidos De Buffalo, Inc., and Altamont Program.

Hearts for the Homeless emergency shelter will continue to operate its mobile shelter. The motor home travels throughout the three towns in the Consortium as well as the City of Buffalo to find homeless persons and provide them with food and clothing. The homeless are assessed as to their needs and referred to proper agencies. The Salvation Army will also cover these same costs for adults who find themselves in similar situations.

Compass House continues to enable youth to move to permanent housing and defray rent and utility arrears to prevent eviction and/or termination.

The Consortium 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 work together to identify the homeless, assess their needs, and refer them to appropriate agencies.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

There are a wide variety of programs and organizations that provide special needs facilities and services to the community. Ensuring access to information for providers and for those in need is critical and is addressed through several different platforms. For people of all ages, any disability and caregivers, NY Connects provides a “one-stop” contact for information about long-term care and includes a local Erie County NY Connects office that provides this service for people who live in Erie County. In addition, 211WNY provides a free and confidential link to health and human services in the region. Finally, for clinical information among health care providers, HEALTHeLINK provides a health information exchange that was launched in January 2009. By 2014, all Western New York area hospitals were HEALTHeLINK participants. Still, discussions at the Health and Human Services stakeholder meeting demonstrate that awareness of existing programs continues to be an issue. Working with individual populations or communities is essential to ensuring access to information and services.

Other key services and facilities provided in Erie County for special needs populations include:

- Ready Set Home: Funding available under the Access to Home program for home modifications to help make the home more accessible for a person with a disability.
- Going Places: A service to older adults (aged 60+) in Erie County, in collaboration with community partners to provide curb-to-curb van services to seniors who are unable to use conventional means of transportation.
- Summer Youth Employment Program: Erie County, in partnership with Buffalo Urban League and Catholic Charities, connects youth with worksite providers.
- Erie County Opioid Task Force: Created in 2016 to bring health care providers, law enforcement and first responders, health insurance executives, victim advocates and government officials together to address the opioid epidemic. Since 2016, additional inpatient and outpatient treatment options are available to those with drug addiction including more methadone clinics and inpatient treatment beds.⁵
- NYS Plan to Ending the AIDS Epidemic: In 2014, Governor Cuomo detailed a three-point plan to move closer to ending the AIDS Epidemic in NYS.
- Cheektowaga Hub: Provides employment and training opportunities, utility assistance, legal aid, healthcare, housing assistance and counseling.

Additionally, health and human service partners within the community provide a variety of services, such as:

- Evergreen Health provides HIV care including care coordination, pharmacy, health insurance enrollment, HOPWA and other supportive housing opportunities, transportation assistance, food pantry, mental health counseling, substance use counseling and support groups.

⁵ <https://buffalonews.com/2019/07/29/poloncarz-says-he-may-declare-erie-countys-opioids-crisis-over-by-next-year/>

- Haven House provides services based on a continuum of care ranging from a fully inclusive emergency shelter in a confidential location to long-term transitional housing for victims of domestic violence.
- New Life Residential Center provides a recovery house for women with substance abuse, mental health or domestic violence abuse.
- Rural Transit Service provides community transportation needs for senior citizens, disabled and low/moderate income residents in Erie County.
- Go Buffalo Mom, a program that helps ensure pregnant mothers' access prenatal care on a consistent basis.
- Neighborhood Legal Services provides free legal services to people with low-income and people with disabilities.

A central characteristic of supportive housing is that the needs are broad, and the care providers are varied. Ensuring that each population can access information and services needed is a critical to meeting the needs of the population.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The following discussion identifies needs for each of the identified populations, utilizing information gathered during the Stakeholder Meetings for the Consolidated Plan.

For elderly and frail elderly, the needs continue to grow as the population ages. This presents additional service needs as well as staffing needs as the overall population is growing at a lower rate than that of the population of 65 and over. One of the primary concerns is the need for access to services and transportation. For some seniors whose license has been taken away, their ability to access basic needs is limited and they are at risk of isolation. As a disproportionate number of seniors are at 100 to 149% of the poverty level, there is a need for more affordable housing. One specific issue that was raised during one of the Stakeholder Meetings was the closing of adult homes and the relocation to places within the region. It was discussed that seniors want to be in certain areas, generally near their doctors. At times this translates into seniors housed in a hotel. Healthcare costs and waitlists for care are also a central issue with additional challenges for seniors with special needs. With increasing mental health issues for seniors, one suggestion from the Stakeholder Meetings was to have onsite mental healthcare at local senior centers.

For persons with developmental disabilities, there are limited options available and what does exist is limited as well. With more people with intellectual and developmental disabilities (IDD) living within the community, there is an increased need for support services. Coordination of services is a need for this and other disabilities, focusing on supporting the person rather than the disorder.

For those with ambulatory difficulties, the most common disability status, ensuring communities are accessible is an important need for all communities. Ambulatory difficulties affect those of all age

groups, particularly those 65 and over. With over half of the 65 years or older population with ambulatory difficulty, accessibility is likely to be an increasing issue as the Consortium continues to ages.

For those with alcohol or other drug addictions, although there has been a decline in the amount of opioid related deaths, there are still those in the community that need help in dealing with addiction.

For domestic abuse victims who seek emergency shelter, there is a need for housing. Those that seek emergency shelter may have nowhere else to go but back to their abuser, creating a life and death situation.

For persons with HIV/AIDS, Governor Cuomo's three-point plan to Ending the AIDS Epidemic in New York State includes identifying people with HIV who remain undiagnosed and linking them to health care, linking and retaining people diagnosed with HIV to health care and getting them on treatment to maximize HIV virus suppression, and providing access to Pre-Exposure Prophylaxis (PrEP) for people who engage in high-risk behaviors to keep them HIV negative.⁶

For refugee populations, needs identified include support and advocacy. In addition, for agencies and organizations who work with refugees and limited-English speaking populations, there is a need for training for cultural differences and language barriers. It was suggested that the training could be developed for multiple organizations, potentially utilizing a webinar format.

For children and youth, needs identified include a 24-hour center for youth, adult living skills training, after school programming for all youth as well as access to and affordability of childcare.

Identified as an issue for women was the available access to prenatal care. In addition, with the majority of single (non-married) householders with their own children under 18 years of age being female, combined with a lower female median income, ensuring access to childcare, services and employment are critical.

Also critical is ensuring that the development and implementation of programs is inclusive of minority populations. With disparities in poverty level data identified, it is necessary to address how services are being provided and to provide better access to programs.

Other issues included the need for prevention services and to pay attention to the Asset Limited, Income Constrained, Employed (ALICE) population in order to help the population maintain housing and prevent homelessness.

Finally, staffing difficulties were noted during the stakeholder meeting for Health and Human Services, including difficulty finding nurses or clinicians and van drivers. With these staff positions necessary to provide certain services, this is an important consideration in addressing need.

⁶ <https://www.governor.ny.gov/news/governor-cuomo-announces-new-york-state-track-end-aids-epidemic-end-2020-and-proposes-new>

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Through the County there are programs to assist people living in nursing homes to move back into their home, which can be accessed through Erie County NY Connects. Additionally, Western New York Independent Living, Inc. provides transition from a nursing home or hospital and assists in providing information to individuals about “transitioning” or diversion from costly institutions, such as hospitals, nursing homes and/or psychiatric hospitals, through community based and independent living programs and skills.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

In the upcoming year, the Town of Amherst will undertake and fund multiple activities to address the housing and supportive services needs with respect to individuals who are not homeless but have other special needs.

Housing Related Activities and Services

- Provide HOME Rental Subsidies to leverage the development of affordable rental housing units for vulnerable populations such as seniors or disabled adults
- Promote Home Ownership for Low-Moderate Income Households by providing purchase assistance to first-time low-to-moderate income home buyers who purchase an existing house, or one provided for sale through Acquisition Rehabilitation Programs
- Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable housing
- Provide fair housing counseling services through Housing Opportunities Made Equal
- Provide public services through
- Provide housing related services through Belmont Housing Resources for WNY who 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
- Provide housing counseling services through the Buffalo Urban League who 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

Activities Relating to Other Supportive Services

- Provide public services through the YWCA of WNY, who 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
- Assist the Family Justice Center with facility improvements and Outreach to Teens regarding intimate partner violence. The Family Justice Center has a satellite office in Amherst to assist victims of domestic violence by providing a safe and secure location with service providers available on-site
- Provide after-school programming with the Boys and Girls Club of Buffalo in the Eggertsville Community Center to serve youths from low-and-moderate income families in the neighborhood
- Support the Amherst Senior Center's wheelchair accessible van utilized to assist individuals with restricted mobility and disabilities.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

See response above.

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment

Erie County and the ACT Consortium are completing an Analysis of Impediments to Fair Housing Choice that has identified public and private barriers to affordable housing, while tracking recent efforts to remove or eliminate the barriers and developing an action plan to further and expand upon those efforts.

Public policies have been identified in prior Impediments Analyses as barriers to affordable housing and residential investment, and they continue to exist. Specifically, each Consortium community has zoning and land use requirements that incentivize the construction of single family, market rate housing over higher density multi-family development that is more likely to be affordable, such as:

Amherst:

- Town zoning allows the construction of single-family detached units in all multi-family zoning districts and market forces encourage developers to choose market rate single family throughout most of the town
- Lot coverages are frequently limited, adding to the cost of development
- Two parking spaces are required per unit, adding to the cost of development
- Density is limited across zoning districts

Cheektowaga:

- Large minimum lot sizes increase development costs
- In multi-family zones large minimum unit requirements increase development costs
- Multi-family projects are required to create two off-street parking spots, but additional guest parking, increasing development costs

Note: Cheektowaga does currently have some of the more affordable housing opportunities in Erie County, so the barriers pertain mostly to new construction and the creation of additional supply

Tonawanda:

- Large minimum lot sizes increase development costs
- Large square footage requirements for multi-family projects, increases development costs

Beyond public policies, barriers such as NIMBYism, market conditions and the cost to develop new housing, the need for additional affordable housing funding, and an overall lack of supply continue to exist. Consortium communities have taken strides to mitigate or eliminate the barriers, but more work remains to be done, consistent with the strategies identified in the SP-55.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

In determining priorities for the allocation of federal funds, Amherst recognizes the need to foster a competitive local economy that expands economic opportunities for present and future residents. This section describes the local workforce, the nature of current employment, and activities that coordinate economic development efforts among local and regional agencies.

Economic Development Market Analysis

As of 2019, economic indicators suggest that the Town of Amherst may be performing slightly ahead of Erie County as a whole, New York State, and the nation. The unemployment rate in the Town in September 2019 was 3.4%, compared to Erie County's rate of 3.9%, the State unemployment of 3.7%, and the national unemployment rate of 3.6%. Unemployment in the Town hit a high annual average rate in 2012 of 6.5%, which was well below the recent high unemployment rates in the other Consortium communities of Tonawanda (7.6% in 2009) and Cheektowaga (8.6% in 2012). Unemployment in Amherst has been declining steadily since 2012. Amherst has also experienced a growth in the total number of jobs. The number of jobs reflected in the table below (79,465) represents an increase of 6.6% over the number of jobs in the Town reflected in the 2006-2010 ACS. Job growth was spread across industry sectors, with only Information, Professional, Scientific, Management Services, and Retail Trade experiencing a decline in the number of jobs as compared to the prior five-year period. The number of jobs in the Town is significantly higher than the number of workers, particularly in the following industry sectors: Arts, Entertainment, Accommodations; Education and Health Care Services; Finance, Insurance, and Real Estate; Professional, Scientific, Management Services; and Retail Trade, indicating that a large number of workers from surrounding communities commute to Amherst for work.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	70	106	0	0	0
Arts, Entertainment, Accommodations	5,672	11,250	12	13	1
Construction	1,266	1,296	3	1	-1
Education and Health Care Services	9,334	17,342	20	20	0
Finance, Insurance, and Real Estate	4,852	13,412	10	15	5

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Information	921	800	2	1	-1
Manufacturing	3,710	2,371	8	3	-5
Other Services	2,072	3,179	4	4	-1
Professional, Scientific, Management Services	6,161	12,355	13	14	1
Public Administration	0	0	0	0	0
Retail Trade	5,709	11,997	12	14	1
Transportation and Warehousing	1,266	1,140	3	1	-1
Wholesale Trade	2,337	4,217	5	5	0
Total	43,370	79,465	--	--	--

Table 73 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	63,146
Civilian Employed Population 16 years and over	60,505
Unemployment Rate	4.21
Unemployment Rate for Ages 16-24	8.21
Unemployment Rate for Ages 25-65	2.82

Table 74 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	20,365
Farming, fisheries and forestry occupations	2,269
Service	4,533
Sales and office	14,740
Construction, extraction, maintenance and repair	2,200
Production, transportation and material moving	1,643

Table 75 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	45,710	80%
30-59 Minutes	10,312	18%
60 or More Minutes	1,225	2%
Total	57,247	100%

Table 76 - Travel Time

Data Source: 2011-2015 ACS

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,045	90	635
High school graduate (includes equivalency)	5,470	265	2,255
Some college or Associate's degree	10,940	500	3,145

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	29,210	815	5,055

Table 77 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	8	160	104	363	729
9th to 12th grade, no diploma	589	310	125	699	1,315
High school graduate, GED, or alternative	2,715	1,085	1,350	5,550	6,320
Some college, no degree	10,125	1,770	1,370	4,958	4,145
Associate's degree	990	1,213	1,390	3,895	1,630
Bachelor's degree	2,480	5,120	3,592	8,585	3,830
Graduate or professional degree	378	4,255	4,443	9,075	5,230

Table 78 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	42,446
High school graduate (includes equivalency)	91,751
Some college or Associate's degree	113,582
Bachelor's degree	165,530
Graduate or professional degree	215,578

Table 79 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The Education and Health Care Services sector employs the largest number of workers, which represents 20% of employed residents, followed by Professional, Scientific, Management Services at 13%, Arts, Entertainment, Accommodations and the Retail Trade sector which each employ 12% of Township residents, and Finance, Insurance, and Real Estate which employ 10% of residents.

Describe the workforce and infrastructure needs of the business community:

A comparison of the educational attainment of the labor force in the Town of Amherst, as reflected in the 2006-2010 ACS and the 2011-2015 ACS, indicates growth in the two ends of the educational spectrum, in the number of workers who have not completed High School and the number with a Bachelor’s Degree or Higher. The number of workers with a High School diploma and those with Some College or an Associate’s Degree now account for a lower number of the workforce. In 2017 the Town of Amherst revised its Comprehensive Plan. The Plan acknowledges that over the prior 20 years, Amherst had been an economic driver in the region, accounting for 75% of the region’s job growth. Most of this job growth occurred outside of the Manufacturing, Retail and Wholesale sectors. With a goal of improving its employment base, one challenge facing the Town is how to increase the number of higher paying jobs in proportion to low to middle-level jobs like production/assembly, data processing, and administrative positions. Many employers interviewed as part of the planning process indicated an inability to find local workers to fill high-skill, technical jobs. This is a result of a loss of educated professionals (as college graduates leave the area) and the fact that many workers with high school diplomas or Associates’ Degrees have skills that are out of date or very limited. With a goal of training, attracting, and retaining skilled workers who are prepared for future growth industries, the Town identified the following required initiatives: identify future needs of employers; tailor programs to objectives of workers; expand adult education programs; and provide co-op positions for students.

The objectives outlined in Amherst’s Comprehensive Plan are consistent with a report by Erie Community College, which found that the most significant workforce needs in the region relate to the aging population, the need for workers to remain current with ever-changing technology, and the skills gap that results from a mismatch between educational programs and workforce needs.

Numerous stakeholders also brought up transportation as a significant need for job seekers and a barrier to employment, particularly for low-income shift workers or others with atypical work hours. While commute time is not an issue for workers in the Town of Amherst, with 80% commuting less than 30 minutes, stakeholders’ interviews cited transportation for low-income residents who do not have cars as being a major obstacle for them to obtain and keep jobs, and to access job training and employment related services.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Town of Amherst offers a wide variety of economic development opportunities in all major sectors due to its large size, dense population, high traffic count, available infrastructure, and existing industrial, commercial, and service industries. However, frequent turnover and vacancies in retail space, caused primarily by the global increase in e-commerce, have created economic development needs and related opportunities for the Town.

Consistent with its Comprehensive Plan initiatives of enhancing the livability of its older neighborhoods and revitalizing neighborhood commercial centers, the Town of Amherst has a need to assist the retail, service, and other commercial businesses and buildings that serve those neighborhoods. Preserving and enhancing those assets is one important element of an overall strategy designed to increase the attractiveness and long-term viability of the Town's Eggertsville, Snyder, and Williamsville neighborhoods.

The Town of Amherst's Comprehensive Plan also stresses the need to address the industrial and retail sectors by encouraging the rehabilitation and new construction of buildings that allow tenant flexibility, which dovetails with the universal need to grow the Town's property tax base. A unique opportunity to address both needs exists within the Town's lone federal Opportunity Zone, a 900-acre area that includes the former Boulevard Mall property. The site's location and size make it ideal for mixed-use development that can address a variety of the Town's community and economic development needs.

On a regional level, implementation of New York State's Buffalo Billion Plan has had a significant impact over the Buffalo Niagara Region in terms of both creating economic opportunity and improving the workforce development infrastructure. Investments by New York State in programs to encourage the commercialization of academic research can help advance Amherst's goal, as stated in its Comprehensive Plan, of capitalizing on the presence of the University of Buffalo in the Town as a driver of job creation. In addition, with the State investing in the medical and biotechnology sectors, as evidenced by growth and development in the Buffalo-Niagara Medical Campus, Amherst has the ability to market itself to biotechnology companies with connections to the Medical Campus based on its proximity to both UB campuses and its viability as a location for research and development. However, success in attracting hi-tech growth industries is dependent on having a skilled workforce to support them.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

There exists a disconnect between the skills possessed by job seekers and those required for many of the available employment opportunities. Stakeholders pointed specifically to trends toward advanced manufacturing creating a skills gap for both older employees and job seekers and new entrants to the labor pool. New and ongoing public and private investments in advanced manufacturing, energy-related fields, and the technology sector are anticipated to only widen that gap. This is particularly the case in Amherst, where there is an emphasis on growing higher paying hi-tech jobs.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The ACT Consortium participates in the workforce development and training initiatives sponsored by the Buffalo and Erie County Workforce Investment Board. This includes WorkSourceOne, a one-stop career center that offers counseling and career exploration, resume preparation and letter writing services, job search planning and preparation, career training, job referral and placement, math and reading

assistance, GED preparation, a state of the art resource center, supportive services, and financial aid. Erie Community College also participates in the WorkSourceOne initiative as a one-stop shop for these resources. WorkSourceOne operates four Affiliate Career Service Centers: two in Williamsville (in the Town of Amherst), one in Buffalo, and one in Orchard Park.

Erie County's Board of Cooperative Educational Services (BOCES) provides a wide range of training and career programs to high school students and adults. Erie 1 BOCES offers career training and free literacy programs to help adults meet their career goals by developing essential skills for gainful employment and job advancement, including programs in such high-demand fields as CNC machining and welding. In addition, Erie 1 BOCES Workforce Development provides workforce training services to both large and small employers.

Erie Community College provides customized non-credit professional development training to local businesses and community residents through its Workforce Development program, including upgrade training to skilled professionals who have already obtained a degree and technical and soft-skills training needed for job retention and advancement. ECC also works with businesses, particularly in the manufacturing, healthcare, retail and services businesses, to assess training needs and create customized programs for employees. ECC's North Campus is located in Amherst.

The Northland Workforce Training Center, located in Buffalo, provides training to help workers capitalize on new economic opportunities in the advanced manufacturing and energy fields. Other agencies providing employment and workforce development programs to Erie County residents include: The Salvation Army; Mental Health Peer Connection; Goodwill Work Experience Contract Program; ECC CAST Program; and Goodwill Subsidized Employment Services.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

In 2016, the Erie County Industrial Development Agency finalized a five-year update of a CEDS that was adopted in 2011 and that encompasses all of Erie County. The 2016 CEDS took into account the findings and strategic initiatives derived from recent regional planning and economic development efforts, including the Western New York Regional Economic Development Council (WNYREDC) Strategy for Prosperity in Western New York and One Region Forward – A New Way to Plan for Buffalo Niagara. These planning efforts include among their primary strategic principles the preparation of a stronger workforce through, among other actions, expanding training and apprenticeship programs (and making them more inclusive), aligning skills training with the current and future job market, and promoting better connections between schools and job readiness.

The ACT Consortium is an active participant in the One Region Forward sustainable economic development plan, which was adopted in 2015 and which sets forth a comprehensive economic development strategy for Erie County and Niagara County. One Region Forward incorporates recommended strategies and actions that support economic development, manage infrastructure costs, provide accessibility to jobs, education, and healthcare, and improve neighborhoods by offering more housing choices.

In 2017 the Town of Amherst adopted a Comprehensive Plan, which is intended to guide decision making by the Town as it confronts its transition from a growing community to a town that is mature and largely built-out. The Plan establishes goals, objectives, and policies in the following areas: Land Use and Development; Natural and Cultural Resources; Economic Development; Transportation; Infrastructure; Housing and Neighborhoods; and Community Facilities.

EnVision Centers

The ACT HOME Consortium is not in close proximity to any existing EnVision Centers; however Consortium Initiatives and the Consolidated planning process overlap significantly with the membership of the EnVision Network and feature providers active within the Four Pillars of Envision Support; The Economic Empowerment Pillar, the Educational Advancement Pillar, the Health and Wellness Pillar, and the Character and Leadership Pillar.

The Consolidated Plan stakeholder meetings elicited feedback from representatives of Public Housing Authorities, Industrial Development Agencies, Economic Development Agencies, and other Non-Profit Corporation serving a variety of Consortium needs. Stakeholder efforts align directly with Envision Center Goals in the area of expanding economic opportunity and in closing the skills gap that exists between many residents of HUD-assisted housing and the jobs available in and around Consortium communities. The existing service networks and ongoing economic growth and workforce development initiatives create an excellent environment for a future Bricks and Mortar EnVision Center.

The One Region Forward and Erie County CEDS initiatives seek to target workforce development activities that have high levels of synergy with the Workforce Investment Board's initiatives, including CDBG-funded adult basic education programs. This will help these young workers improve their employment options in the regions increasingly advanced and competitive economy.

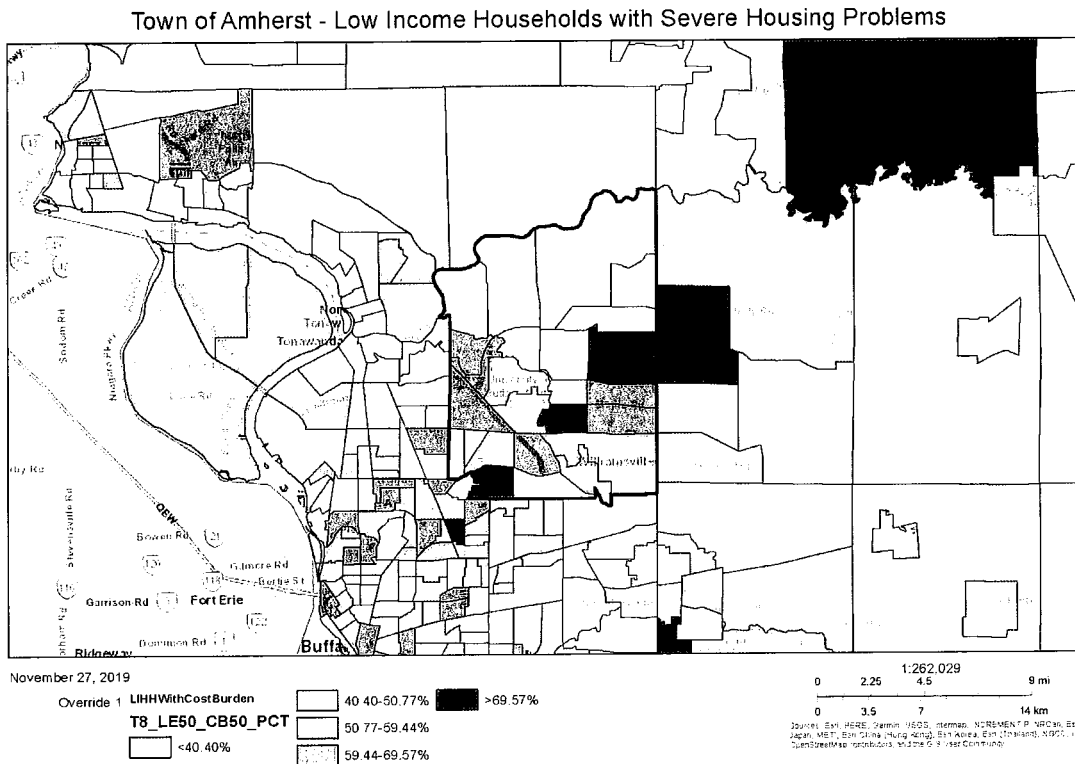
MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?
(include a definition of "concentration")**

To look at housing problems, HUD CPD data was used to display the percentage of low-income households (those earning 0%-50% of HUD Area Median Family Income) experiencing one or more severe housing problems. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than 1.5 persons per room)
- Housing costs greater than 50% of household income

In this case, "concentration" is defined as having a value within the top two quintiles of the distribution, which in this case is a value over 59.44%. A total of nine census tracts have concentrations of multiple housing problems within low income households. Specifically Census Tracts 90.07, 91.04, and 95.01 have greater than 70% of low-income households with any of four severe housing problems. Census Tracts 94.16, 91.15, 92.00, 94.02, 90.06, and 90.08 have between 50% and 60% of low-income households with any of four severe housing problems.



Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

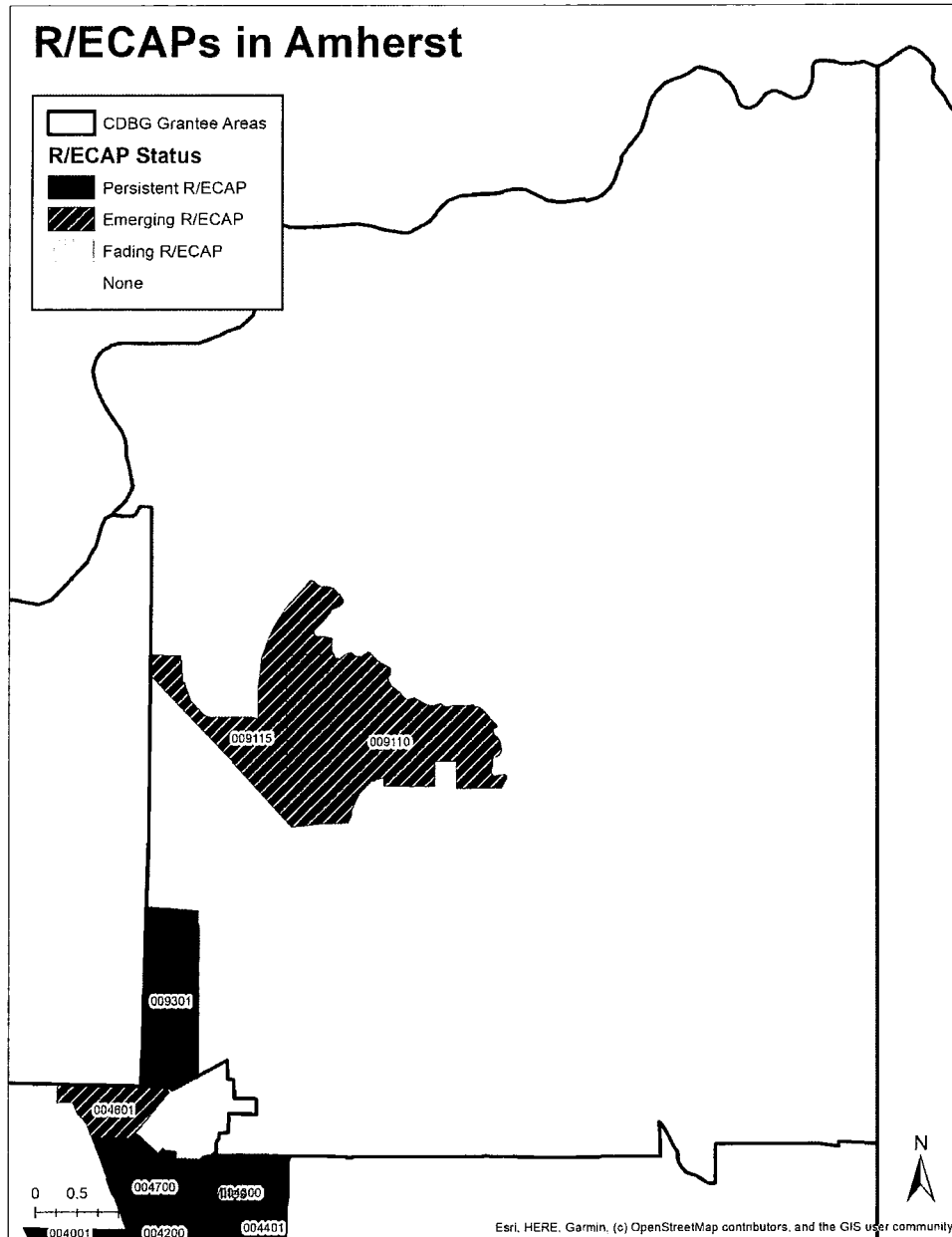
The Analysis of Impediments to Fair Housing Choice (2019) identified three census tracts with significant concentrations of both poverty and minority populations. More specifically, these Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), are defined as areas where the non-white fraction of the population is more than double the overall non-white fraction of the population in the community and where the local poverty rate (census tract) is more than twice as large as the community poverty rate.

The three census tracts listed below have been identified as concentrated areas of racial and ethnic minorities and low-income populations. Census tracts 009115 and 009110 are located adjacent to UB’s main campus. As noted in the Analysis of Impediments, an influential Brookings Institution study recently observed that poverty is often overreported in tracts such as these, as “university-student residents...are misleadingly often counted as living in poverty.”⁷ Consequently, the poverty rates in these two tracts—009110 and 09115—appear alarmingly high. However, when the nuance of their relationship to UB is factored in, there is reason to approach those figures with some caution. Census Tract 009301 is located in the Eggertsville neighborhood.

Tract ID	Population	% Non-White	Poverty Rate
009110	5,843	47.0%	70.6%
009115	4,074	56.6%	51.5%
009301	5,409	45.1%	25.7%

Town of Amherst - Racially or Ethnically Concentrated Areas of Poverty
Source: 2013-17 U.S. Census, ACS, Analysis of Impediments to Fair Housing Choice (2019)

⁷ https://www.brookings.edu/wp-content/uploads/2018/10/Looney_Opportunity-Zones_final.pdf (p. 3)



What are the characteristics of the market in these areas/neighborhoods?

The cluster of low-income households is largely affiliated with the SUNY Buffalo North campus, and the high percentage of students in this area is the main reason for the large low-income population there. This area is more renter-occupied than other areas in the Consortium.

The Eggertsville area is one of the oldest neighborhoods in the Town and is actively shaped by its proximity to the SUNY Buffalo South campus, various commercial centers, and community services located in Windermere School. This neighborhood is characterized by a density and diversity unique to

suburban environments. These factors combine to create unique public safety issues ranging from crime to pedestrian, bicycle, and vehicle interaction which demand increased attention from local agencies including law enforcement.

Are there any community assets in these areas/neighborhoods?

Yes. As a mature first-tier suburb, these areas have significant community assets including diverse housing stock, local businesses, community facilities such as public libraries, regional employment centers, social service providers, government offices, and more.

Are there other strategic opportunities in any of these areas?

Yes. The strategic position of these areas as commuter-friendly, high-amenity communities is crucial to the well-being of the Consortium overall. There are strategic opportunities for redevelopment, infill development, partnerships, and comprehensive economic growth. The One Region Forward economic development strategy will play an integral role in the economic development strategy of these areas in the future, as much of the employment of these areas' residents is focused on the emerging sectors the plan targets.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium is made up of the Towns of Amherst, Cheektowaga, and Tonawanda. The Town of Amherst acts as the Participating Jurisdiction ("PJ") for the ACT HOME Consortium. In this capacity, the Town of Amherst submits grant applications, executes fund disbursements, and prepares reports on all HOME Investment Partnerships Program funds utilized by the three towns.

Assisting income eligible homeowners remains a priority for the Consortium. The Town of Amherst will continue to use CDBG resources to provide funding for the rehabilitation of owner-occupied units, including homes owned by veterans who make up a segment of the Town's older population. Funds will be provided for repairs which bring the property into code-compliance and for lead paint abatement. Emergency repairs will be prioritized. In addition to funding home repairs, the Town will provide funding for accessibility modifications to homes, such as doorway modifications and modifications to kitchens and bathrooms, which are critical to low-moderate income seniors who are aging in place and physically disabled veterans who need assistance in living independently.

Priorities

Improving the Town's housing stock is a key priority for the Town of Amherst, which includes funding for the maintenance and rehabilitation of existing owner-occupied homes (including those with rental units), military veteran household units, and existing renter occupied low-income housing, as well as assisting households in need of improvements for handicapped accessibility, acquiring deteriorated properties for rehabilitation, and providing funding for weatherization. The Town will also provide HOME rental subsidies to leverage the development of affordable rental housing units for vulnerable populations such as seniors and disabled adults and will provide assistance to first-time home buyers. Although these efforts will be directed Town-wide, there will be an emphasis on the Eggertsville neighborhood, which is one of the oldest in the Town and has a concentration of low-moderate income households. CDBG resources will be used to improve the quality of life for families, youths and seniors in the community by providing afterschool programming, community policing events, senior transportation services, and neighborhood outreach, including services at the Boys and Girls Club in Eggertsville and the Town's Senior Center. Historic preservation and elimination of slum and blight activities will occur Town-wide, with a focus on historic structures in the Village of Williamsville. Assistance will be provided to at-risk populations (including victims of domestic violence) and funding will be made available for activities to reduce the risk of homelessness, including housing counseling, foreclosure prevention, and fair housing counseling.

In Amherst, priority needs include:

- Residential Rehabilitation – Owner-Occupied
- Residential Rehabilitation – Owner-Occupied Military Grant
- Handicapped Accessibility
- Residential Rehabilitation – Owner occupied Rental
- New Rental Housing for Special Needs Populations
- Acquisition Rehabilitation/New Construction Resale
- Homebuyer Assistance for Affordable Housing
- Assist Victims of Domestic Violence
- Housing Counseling and Foreclosure Prevention Assistance
- Weatherization assistance
- Fair Housing Counseling
- Historic Preservation
- Community Policing
- Public Services – Youth Services
- Economic Development
- Public Facilities
- Infrastructure

Influence of Market Conditions

The Town of Amherst is in a state of transition, from a community focused on growth to a mature town with an increasing senior population and aging housing stock. This plan identifies the need to preserve the existing housing stock and provide more affordable housing opportunities for vulnerable populations, including seniors. The Town’s housing strategies will be especially informed by the increasing mismatch between incomes and housing costs, the shortage of affordable housing, and the specific accommodations necessary to ensure that special needs populations have adequate affordable options. The Town continues to address the need to maintain community facilities and services, including youth and senior services and assistance to at-risk populations, and the preservation of historic structures within the Town.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

1	Area Name:	Egbertsville
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The Egbertsville target area lies between Niagara Falls Blvd. on the west, Eggert Road and Millersport Highway on the east, Main Street on the south and Sheridan Drive on the north.
	Include specific housing and commercial characteristics of this target area.	This area has an abundance of older homes in the Town as it is the first ring of the suburb bordering the City of Buffalo. The south campus of the University of Buffalo sits at the southwest corner of the area near University Plaza and thus the neighborhood is home to many students. It is bordered by a transportation route on all sides and is one of the main north south corridors in the Town leading to many employment centers. This area has a large low to moderate income population and is also very diverse.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The western portion of the Egbertsville area has a large number of subsidized apartments and older less expensive homes, making it attractive to lower income households as both renters and homeowners. The school system in Egbertsville is also considered a high draw for LMI families, bringing a need for supportive afterschool programs for children and Community Policing Programs for additional safety to the city-adjacent neighborhood.

	<p>Identify the needs in this target area.</p>	<p>The older homes are in need of maintenance and many low-income homeowners do not have the resources to keep up with the maintenance. Youth services and crime prevention are also needed in this target area. Many of the commercial structures have suffered from a lack of investment and are in need of upgrades that improve the aesthetic appeal and economic climate.</p>
	<p>What are the opportunities for improvement in this target area?</p>	<p>The main focus in this area is housing affordability and sustainability. There is also a need for youth services, community policing, parks and public infrastructure investments, and investment within the business corridors.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>Out of town landlords are moving in and purchasing properties to displace families in favor of student rentals, which typically provide higher rents and ROI. Property upkeep declines when this happens and there are opportunities for housing discrimination.</p>
<p>2</p>	<p>Area Name:</p>	<p>Opportunity Zone – Census Tract 92</p>
<p>Area Type:</p>	<p>Local Target area</p>	
<p>Other Target Area Description:</p>		
<p>HUD Approval Date:</p>		
<p>% of Low/ Mod:</p>		
<p>Revital Type:</p>		
<p>Other Revital Description:</p>		
<p>Identify the neighborhood boundaries for this target area.</p>	<p>The Opportunity Zone encompasses Census Tract 92 and is bounded by Niagara Falls Boulevard to the west, Sheridan Drive to the south, and runs approximately along the I-290 corridor on the northeast.</p>	
<p>Include specific housing and commercial characteristics of this target area.</p>	<p>The target area consists of significant, big box retail along highly trafficked commercial corridors, with residential concentrations in the southwestern portion of the target area including a mix of owner-occupied single family and multi-family rental units (Delta Garden and Emerson Square) predominately constructed in the 1950s and 1960s.</p>	

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The federal Opportunity Zone program identified Census Tract 92 as an Opportunity Zone based on information provided by New York State. The closure of the Boulevard mall and redevelopment options for the site have been heavily reported locally and regionally.
	Identify the needs in this target area.	Commercial investment and stable activity with associated housing.
	What are the opportunities for improvement in this target area?	The Opportunity Zone program provides opportunity for significant private investment in commercial activities and supporting residential structures. There are large scale, and significant commercial and mixed-use opportunities along Niagara Falls Boulevard and Maple Road – most notably at the Boulevard mall site.
	Are there barriers to improvement in this target area?	The large-scale nature of the commercial operations will require significant private sector investment. Public improvements to support potential investment and to create green space and/or recreational opportunities, improve the aesthetic, address connectivity, and mitigate safety concerns created through new investment will be important.
3	Area Name:	Town Wide
	Area Type:	Town Wide
	Other Target Area Description:	Town Wide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Amherst Town Wide is bordered by Niagara Falls Blvd. on the west, Transit Road on the east and Wehrle Drive on the south and Tonawanda Creek Road on the north.
	Include specific housing and commercial characteristics of this target area.	While many of the housing programs are concentrated in the older Eggertsville neighborhoods where the household income is more low to moderate, the aging population throughout the Town is becoming eligible due to retiring and depending on social security and pensions while continuing to live in their homes. These homes are aging as well and many are in need of repair or accessibility assistance to offer aging in place.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	More seniors are requesting assistance that want to remain in their homes. While many of the homes in the neighborhoods east of Eggertsville may have a higher assessment, the owners are relying on retirement income.
Identify the needs in this target area.	Mainly housing repair and assistance with accessibility.
What are the opportunities for improvement in this target area?	Sustainability of the neighborhoods, the development of affordable units in areas outside existing R/ECAPS, and allowing senior residents to age in place
Are there barriers to improvement in this target area?	Some of the homes are assessed higher than the HOME limits and larger in size needing more expensive repairs. Accessibility assistance is expensive as well.

Table 80 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The ACT Consortium comprises three communities; Amherst, Cheektowaga and Tonawanda. Each community has its own unique needs and priorities. This section will describe the geographic priorities of ACT Consortium members.

Town of Amherst Geographic Priorities

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.

The Eggertsville target area, including Windermere-Meadow Lea neighborhoods, 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, façade improvements, and Land Bank activities are concentrated in this area. The need within the Eggertsville target area is reflected in the 2020 funding allocation where

Eggertsville is anticipated to receive 50% of the CDBG allocation, in comparison to 20% in the Opportunity Zone and 30% Town Wide.

Town of Cheektowaga Geographic Priorities

The Town of Cheektowaga is a mature first-ring suburb of the City of Buffalo, that faces challenges in ensuring the stability and viability of its neighborhoods and in maintaining the quality of its housing stock.

The Town is addressing its housing challenges by providing housing rehabilitation loans to income-eligible homeowners on a Town-wide basis, including the Village of Sloan and the Cheektowaga portion of the Village of Depew. Funds are allocated between the Town and Villages based on relative census data for populations in those locales. Within the housing rehabilitation program, areas of focus include low-income neighborhoods such as the Pine Ridge, Genesee and Cedargrove Heights areas.

Town of Tonawanda Geographic Priorities

The Sheridan Parkside Village Courts neighborhood is located in the northwestern portion of the Town of Tonawanda and is bounded by Sheridan Drive, East Park Drive, Ensminger Road and the railroad corridor. This community was constructed as “temporary” wartime housing in the World War II era and consists primarily of multi-family housing. Many of the attached units are deteriorated and in sub-standard condition. Achievable rents are low, and the area has become increasingly characterized by a concentration of low-income residents.

The Town of Tonawanda's goal is to provide a greater range of housing opportunities for varying income levels. The redeveloped neighborhood will contain a mix of housing types, tenures and price ranges, including traditional single-family homes, duplexes and patio homes. Other neighborhood amenities, such as public greenways, bike paths, sidewalks, landscaping, street lighting and gateway entrances are incorporated into the design. The Town is also allocating funds to support a Healthy Kitchen/Life Center to serve area residents and teach techniques for cooking healthy food on a budget.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

1	Priority Need Name	Residential Rehabilitation-Owner-Occupied
	Priority Level	High
	Population	Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	Egbertsville, Town Wide
	Associated Goals	Improve Housing Stock
	Description	The program will improve the housing stock through the rehabilitation of owner-occupied units to benefit low and moderate-income households. Upon completion, units will meet all housing codes and be lead-safe. Emergency repairs of existing units will be prioritized.
	Basis for Relative Priority	Improving the housing stock continues to be a high priority.
2	Priority Need Name	Residential Rehab-Owner-Occupied Military Grant
	Priority Level	High
	Population	Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	Town Wide
	Associated Goals	Improve Housing Stock
	Description	This grant of \$5000 toward the rehabilitation assistance is in the form of a 0% loan, forgiven over a five-year period of residency. The rehabilitation will improve the housing stock of owner-occupied units to benefit low and moderate-income households. Upon completion, units will meet all housing codes and be lead-safe. Emergency repairs of existing units will be prioritized.
	Basis for Relative Priority	Improving the housing stock continues to be a high priority and the number of veterans needing assistance has increased in accordance with increase in the older population in the Town.
3	Priority Need Name	Handicapped Accessibility
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Persons with Physical Disabilities
	Geographic Areas Affected	Town Wide
	Associated Goals	Improve Housing Stock, Special Needs Population

	Description	The Town will provide a 0% interest, deferred payment loan for residents to make accessibility modifications to their home. Improvements may include accessible bathroom, kitchen, doorway, or ingress/egress modifications.
	Basis for Relative Priority	The Town and Village demographics have shown a higher than average low-moderate income senior population that would rather age in place in their communities than move into a higher density living environment. Also, more wartime veterans are returning home with life altering injuries that need assistance in gaining independent living.
4	Priority Need Name	Residential Rehab-Owner occupied Rental
	Priority Level	Low
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Egbertsville, Town Wide
	Associated Goals	Improve Housing Stock Rental Housing Owner-occupied Rehabilitation
	Description	The Town and Village will offer Housing Rehabilitation assistance to Owner-occupied Rental properties to rehabilitate approximately 1-2 units of affordable rental housing in owner-occupied 2-unit structures.
	Basis for Relative Priority	Affordable rental housing is in high demand and both the Town and Village have many 2-unit structures that were built prior to 1960. Many of these units have not been maintained properly and are showing signs of deterioration.
5	Priority Need Name	New Rental Housing for Special Needs Populations
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Middle, Elderly, Elderly, Persons with Physical Disabilities, Persons with Developmental Disabilities
	Geographic Areas Affected	Town Wide
	Associated Goals	Improve Housing Stock
	Description	Construction of new affordable rental housing for elderly and/or disabled residents. Stakeholders consistently cited the need for the creation of new affordable rental housing options for senior populations and disabled populations. The Town of Amherst seeks to provide an incentive to non-profit and for-profit developers for the creation of new affordable rental housing units for these special populations in town.

	Basis for Relative Priority	Creating new affordable housing stock for seniors and persons with disabilities is a documented need in town.
6	Priority Need Name	Acquisition Rehabilitation/New Construction Resale
	Priority Level	High
	Population	Low, Moderate
	Geographic Areas Affected	Town wide
	Associated Goals	Improve Housing Stock Promote Affordable Homeownership
	Description	The Town will purchase vacant deteriorated property through mortgage or tax foreclosure, estate sale, short sale, or open market. The rehabilitation or new construction will return the property to acceptable conditions or better and make these properties affordable to a low-moderate-income first-time homebuyer.
	Basis for Relative Priority	Many of the existing vacant properties are becoming deteriorated due to the length of time they sit abandoned. Research into the current housing market shows very few homes for sale in the affordable level that LMI homebuyers can afford that are habitable. The Town has also formed a Distressed Property Task Force to address some of these abandoned property issues.
7	Priority Need Name	Homebuyer Assistance for Affordable Housing -
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Persons with Physical Disabilities
	Geographic Areas Affected	Town Wide
	Associated Goals	Promote Affordable Homeownership
	Description	The Town will provide a 0% interest, deferred payment loan of up to \$5,000 to assist first-time homebuyers afford the closing costs on their first home.
	Basis for Relative Priority	The Town and Village have a very affordable housing stock that is in the process of converting from an older generation to younger families. These loans provide the catalyst for them to make the purchase of their first home.
8	Priority Need Name	Assist Victims of Domestic Violence
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Town Wide

	Associated Goals	Assistance to At-Risk Pop/Reduce Homelessness Risk
	Description	<p>The Town provides CDBG resources to support the YWCA's 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 and Buffalo Urban League to prevent homelessness of certain at-risk populations.</p> <p>The YWCA provides case management services for homeless domestic violence victims, with four housing units in the Town of Amherst.</p>
	Basis for Relative Priority	There has been a great need identified in the region for temporary housing and supportive services for those escaping domestic violence.
9	Priority Need Name	Housing Counseling & Foreclosure Prevention Assist
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Town Wide
	Associated Goals	Provide Assistance to At-Risk Population
	Description	<p>The Town contracts with two HUD-certified housing counseling agencies to provide one-on-one counseling with low-moderate income eligible residents with housing issues, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc. Belmont Housing Resources for WNY administers the Section 8 rental assistance program for all of Erie County (except for City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at risk of mortgage default or foreclosure.</p>
	Basis for Relative Priority	American Community Survey statistics show that a segment of the Town's residents experience financial stress that may lead to housing instability issues. A housing counselor assists these residents with budgeting, financing, and referrals for those experiencing risk of mortgage default. In addition, HUD accredited counseling and financial education is made available to eligible first-time homebuyers to prepare them for homeownership.
10	Priority Need Name	Weatherization Assistance
	Priority Level	High

	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Town Wide
	Associated Goals	Improve Housing Stock Weatherization Assistance
	Description	The Town will contract with Supportive Services Corporation to provide energy assistance such as insulation, caulking, or newer energy-efficient appliances for income eligible Town and Village residents.
	Basis for Relative Priority	The Town and Village have approximately 23,000 housing units of which 80% were built prior to 1960. Many of these homes have deteriorated to the point of becoming energy inefficient.
11	Priority Need Name	Fair Housing Counseling
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Town Wide
	Associated Goals	Affirmatively Further Fair Housing
	Description	The Town has contracted with Housing Opportunities Made Equal (HOME), a Fair Housing Counseling and Enforcement Agency to educate, counsel and resolve complaints in the Town of unfair housing practices and discrimination in housing and employment. The agency also offers landlord-tenant education and mediates landlord tenant disputes. The Town's Fair Housing Officer receives calls and complaints regarding perceived discrimination or unfair housing practices but does refer the complaint to the agency for resolution or legal assistance.
	Basis for Relative Priority	The Town has a large number of rental units both privately owned and investment property as well as many rental assistance units, senior and multi-family.
12	Priority Need Name	Historic Preservation
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Middle
	Geographic Areas Affected	Town Wide
	Associated Goals	Historic Preservation/Elimination of Slum & Blight

	Description	The Village of Williamsville is home to many historic structures, and many have been given landmark status. The Village will use a significant portion of their share of CDBG funding for the restoration of the Williamsville Meeting House and the Section House to preserve the Historic Landmarks. The projects will be considered under the spot slum and blight designation.
	Basis for Relative Priority	Many of the existing historic buildings in the Village are in need of repair to maintain their viability.
13	Priority Need Name	Community Policing
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Eggertsville, Town Wide
	Associated Goals	Community Services
	Description	The Amherst Recreation Department and Police Department will hold community policing and public safety events in targeted neighborhoods, including events at the Eggertsville Community Center, to foster better community relationships to the local police force. CDBG funding will support the Community Policing events.
	Basis for Relative Priority	The Amherst Police have identified a higher rate of incidents in some of the target neighborhoods that have a larger population of single parents and lower income housing. Through their Community Policing program and the additional hours spent working with the youth of the neighborhoods they are building a non-confrontational rapport and offering residents a stronger sense of security.
14	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Eggertsville, Town Wide
	Associated Goals	Community Services

	Description	<p>The Eggertsville Community Center’s Boys and Girls Club Program (Prime Time) provides structured recreational activity for youth ages 4-14 during after school hours and also throughout the summer season. In addition, the Town has contracted with Catholic Charities to provide counseling and support to at-risk youth and their families identified through the schools and after school programs in the Town.</p> <p>The Town uses CDBG resources to support senior van transportation to shopping area, scheduled medical appointments, and trips to the senior center.</p>
	Basis for Relative Priority	<p>Through neighborhood planning efforts, residents have identified the need to provide additional recreational activity for at-risk youth and also provide a stronger presence of community support in a non-confrontational environment. Stakeholders in the health and human services fields also cited a need for increased after school and summer programming for youth throughout Erie County.</p> <p>Senior transportation was identified as an important service by stakeholders at both the Regional Agencies and Health and Human Services Meetings.</p>
15	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Low, Moderate
	Geographic Areas Affected	Eggertsville, Opportunity Zone
	Associated Goals	Economic Development/Neighborhood Improvement
	Description	CDBG funding can support the Facade Improvement Program to revitalize deteriorated businesses who hire a LMI person or serve a LMI neighborhood and public improvements can be made to enhance and leverage private investments in economic development.
	Basis for Relative Priority	<p>Increased business vacancies, deterioration of small commercial buildings, and loss of retail jobs in Eggertsville have led to shrinking economic activity and quality of life in Racial/Ethnic Concentrated Areas of Poverty. Additionally, word of the closure of the Boulevard Mall, and the designation of Census Tract 92 as a federal Opportunity Zone, provide a need and opportunity for significant economic activity.</p> <p>The Town Comprehensive Land Use and Development Plan features “target capital improvements to leverage private investment and enhance community appearance” as one of the prime objectives.</p>
	Priority Need Name	Public Facilities

16	Priority Level	Low
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	Eggertsville, Town Wide
	Associated Goals	Public Facilities and Infrastructure
	Description	The Town will invest in public facilities in order to beautify, connect, and revitalize neighborhoods. CDBG resources will be used to support the conversion of the Glen Park Nature Center to a public pavilion.
	Basis for Relative Priority	Both neighborhood plans and the Town’s comprehensive land use plan have identified the need to maintain neighborhood assets and community gathering places that help keep social networks intact.
17	Priority Need Name	Infrastructure
	Priority Level	Low
	Population	Extremely Low, Low, Moderate, Persons with Physical Disabilities
	Geographic Areas Affected	Eggertsville, Town Wide
	Associated Goals	Public Facilities and Infrastructure
	Description	The Town will invest Block Grant funds in sidewalk improvements in accordance with ADA and provide additional Right of Way improvements in low- and moderate-income neighborhoods including signage, benches and beautification efforts.
	Basis for Relative Priority	Many of the existing ramps are becoming deteriorated due to the weather in the area and the plowing during the winter season and need replacing. Additionally, maintaining and improving neighborhood assets and connectivity are highlighted in the Town’s comprehensive land use plan.

Table 81 – Priority Needs Summary

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	ACT Consortium Members will not utilize HOME funds for TBRA.
TBRA for Non-Homeless Special Needs	ACT Consortium Members will not utilize HOME funds for TBRA for Non-Homeless Special Needs.
New Unit Production	ACT Consortium members will use HOME funds for the development of new housing units, specifically through subsidies for new rental housing for seniors and persons with disabilities. The Town of Amherst will utilize HOME to leverage larger affordable housing developments to mitigate the increasing funding gaps not-for-profit developers are encountering with affordable housing projects.
Rehabilitation	ACT Consortium members will continue to provide CDBG and HOME Program funding support for owner-occupied housing rehabilitation programs for households at or below 80% AMI in an effort to preserve affordable ownership opportunities. ACT Consortium members may also offer rehabilitation assistance to owners of rental housing who rent to income-eligible tenants.

Table 82 – Influence of Market Condition

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

The following table shows the amount of funds expected to be available in Year One of this Consolidated Plan.

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	\$550,000	\$150,000	0	\$700,000	\$2,800,000	CDBG
HOME	public - federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership	\$800,000	\$300,000	\$0	\$1,100,000	\$4,400,000	HOME

Table 83 - Anticipated Resources

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 coordinates housing rehabilitation initiatives with CDBG and HOME funding with other supportive services that serve the Consortium and programs such as the Home Energy Assistance Program. The Town received a \$300,000 New York State Affordable Housing Corporation Grant in 2018 that offers single-family homeowners a forgivable grant amount toward the rehabilitation of their home that matched CDBG or HOME funds 60/40. The Town will continue to pursue AHC funding when available.

The Consortium communities have each been awarded funding through New York's Zombie 2.0 Program after receiving funds through the first round, *Zombie and Vacant Remediation and Prevention Initiative*, in 2016.

The Town will be also pursuing New York Main Street grant funding to leverage façade improvement investments in the Town's older neighborhood business districts, such as Eggertsville, to improve the climate for business and economic development and to create/retain jobs for lower-income individuals. Additionally, the bulk of the Buffalo Erie Niagara Land Improvement Corporation (BENLIC) activities are anticipated to occur in the Eggertsville target area.

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

No publicly owned land or property located within the jurisdiction will be used to address identified needs.

Discussion

The leveraged Affordable Housing Corporation funds supplement the housing rehabilitation program to offer 60% of the loan as a grant to be forgiven pro-rata based on the total amount of State assistance in the activity.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Town of Amherst Community Development	Departments and agencies	Economic Development, Non-homeless special needs, Ownership	Jurisdiction
Town of Amherst Senior Services	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Town of Amherst Youth and Recreation Department	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Belmont Housing Resources for WNY	Non-profit organization	Ownership, Rental	Region
Cheektowaga Township	Government	Ownership, Rental	Jurisdiction
Town of Tonawanda	Government	Ownership	Jurisdiction
New Opportunities Community Housing Development Corporation	Non-profit organization	Ownership	Jurisdiction
Housing Opportunities Made Equal	Non-profit organization	Rental	Region
Family Justice Center of Erie County	Non-profit organization	Non-homeless special needs, public services	
NYS Affordable Housing Corporation	Departments and agencies	Ownership	State
Child and Family Services	Non-profit organization	Non-homeless special needs, public services	Region
Buffalo Urban League	Non-profit organization	Ownership, Rental	Region
Erie County Supportive Services	Non-profit organization	Ownership, Rental	Jurisdiction
Village of Williamsville	Government	Non-homeless special needs, neighborhood improvements, public services	Jurisdiction

Table 84 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths

A major positive of the institutional structure is the long history and relationship among the three ACT Consortium municipalities. Since 1992, the various public institutions have worked together to ensure that the Consortium remains a positive structure bound through a variety of governance documents including a cooperative agreement, memorandum of understanding, and a workable committee structure.

Gaps

A few gaps do exist within the institutional structure, which can prevent the Consortium from fully addressing needs noted in the Five-Year Consolidated Plan. These are noted below.

- **CHDOs.** The existing CHDOs have been unable to satisfy the new HUD requirements regarding development experience and organizational capacity. This has created a severe shortage of CHDOs within the Consortium area. The CHDOs that do serve the Consortium area focus on construction of low-income senior housing. Although this is a high need, additional CHDO activity is needed for housing acquisition/rehab/new construction. This may require establishing new CHDOs or expanding the reference point/priority of existing ones.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance			
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X		
Supportive Services			
Alcohol & Drug Abuse			
Child Care	X		
Education			

Employment and Employment Training			
Healthcare	X		
HIV/AIDS			
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			
Other			

Table 85 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Counseling/Advocacy-The Consortium and its partners provide counseling and advocacy services that seek to identify the needs of the homeless and link with appropriate treatment and other supports, and assist in finding safe, affordable, permanent housing.

Legal Assistance-Legal assistance benefits include a handful of services available to all eligible individuals, whether they qualify for on-going benefits or not. These Legal Assistance benefits help with utility shut-offs, back rent, temporary shelter for people who are homeless; and emergency housing issues like help with emergency moving and storage costs and help getting a security agreement.

Mortgage Assistance-The institutional delivery structure includes Counseling Agencies that can help homeowners get information on foreclosure counseling or loan modifications.

Rental Assistance-Counseling Agencies can help renters get information that include eviction prevention and referrals to emergency rental assistance. The homeless can explore transitional housing, section 8 subsidized housing units, and security deposit assistance programs.

Utilities Assistance-The Consortium's institutional structure includes utilities assistance through the HEAP. HEAP is federally funded assistance with home heating costs and energy conservation for eligible households. Program components include benefit assistance for heat and electricity, furnace repair or replacement, weatherization referral, and cooling assistance (in summer months-based on medical necessity).

Other Street Outreach Services-The Erie County Department of Social Services has contracted Crisis Services to serve homeless individuals in need of emergency shelter when DSS-Emergency Housing is closed. These services are available to persons in need in the Consortium.

Education-Various organizations in the institutional structure offer educational and vocational training for low-income populations. These programs include GED or certificate programs, specific skill development, resume writing, interview training, and assistance with locating jobs through job boards and referrals.

County Employment and Employment Training-Employment assistance and training are provided by Restoration Society, Vocational and Educational Services for Individuals with Disabilities, Workforce Investment Board, Niagara Frontier Vocational Training Center.

Healthcare-The Erie County Health Department's Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies throughout the Consortium.

These additional programs provide financial management intervention, counseling services, advice on budgeting and financial problems, and other life skills. The programs include: Consumer Credit Counseling Service of Buffalo, Catholic Charities, Business and Professional Women of Buffalo, and Cornell Cooperative Extension.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Strengths

Persons who are homeless have access to the various elements of the Continuum of Care available throughout Erie County through a variety of means. One key access point for services is the Homeless Hotline operated by Crisis Services. This 24-hour service provides information and referral about programs in every part of the Continuum of Care. It also serves as an entry point into the Crisis Services Homeless Program, which provides services to homeless persons on the street and case management for persons moving through the Continuum of Care.

In addition, the Crisis Services Street Outreach Program reaches low-income persons on the street throughout the County, as well as individuals frequenting area soup kitchens. This program has a primary focus on serving homeless persons who are mentally ill.

Gaps

One area in need of improvement will be the determination of need of those who are not presently accessing services. The Consortium does not receive any direct homeless assistance but relies on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Section 8 emergency housing assistance.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority 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 Five-Year Consolidated Plan and the 2020 Action Plan goals do address assisting frail elderly and those at risk of homelessness.

Hearts for the Homeless emergency shelter will continue to operate their mobile shelter. The motor home travels throughout the Consortium 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.

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 agency.

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 three units of Transitional Housing in the Town for families re-establishing themselves after the disruption of domestic violence.

SP-45 Goals - 91.415, 91.215(a)(4)

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	Egbertsville Town-Wide	Handicapped Accessibility Residential Rehab-Owner occupied Rental Residential Rehab-Owner-Occupied Military Grant Residential Rehabilitation-Owner-Occupied HOME Construction Rental Subsidy - Special Populations	CDBG: \$1,248,800 HOME: \$725,000	Homeowner Housing Rehabilitated: 100 Household Housing Units Rental units rehabilitated: 2 Household Housing Units Special Population constructed: 6 Units
2	Promote Affordable Homeownership	2020	2024	Affordable Housing	Egbertsville Town Wide	Acquisition- Rehabilitation/New Construction- Resale Homebuyer Assistance for Affordable Housing	CDBG: \$72,500	Direct Financial Assistance to Homebuyers: 10 Households Assisted Homeowner Housing Added: 5 Household Housing Unit

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	Egbertsville Town Wide	Assist Victims of Domestic Violence Housing Counseling & Foreclosure Prevention Assistance	CDBG: \$25,000	Homelessness Prevention: 700 Persons Assisted
4	Weatherization Assistance	2020	2024	Affordable Housing	Egbertsville Town Wide	Weatherization Assistance	CDBG: \$25,000	Homeowner Housing Rehabilitated: 50 Household Housing Unit
5	Affirmatively Further Fair Housing	2020	2024	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG: \$25,000	Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted
6	Historic Preservation/Elimination of Slum & Blight	2020	2024	Preservation	Town Wide	Historic Preservation	CDBG: \$168,000	Facade treatment/business building rehabilitation: 1 Business
7	Community Services	2020	2024	Non-Housing Community Development	Egbertsville Town Wide	Community Policing Public Services - Youth Services including Boys & Girls Club Senior Van Services	CDBG: \$260,000	Public service activities other than Low/Moderate Income Housing Benefit: 3520 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Economic Development/Neighborhood Improvement	2020	2024	Non-Housing Community Development	Town Wide, Eggertsville, Opportunity Zone	Economic Development/ Public Facilities – Neighborhood Beautification/Infrastructure	CDBG: \$60,000	Facade treatment/business building rehabilitation: 2 Business Jobs created/ Jobs retained: 2 Jobs
9	Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	Town Wide, Eggertsville, Opportunity Zone	Neighborhood Beautification/Public Infrastructure	CDBG: \$80,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted

Table 86 - Goals Summary

Goal Descriptions

<p>1</p>	<p>Goal Name Improve Housing Stock</p> <p>Goal Description The Town 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. Amherst will also provide HOME Rental Subsidies to leverage the development of affordable rental housing units for vulnerable populations such as seniors or disabled adults.</p>
<p>2</p>	<p>Goal Name Promote Affordable Homeownership</p> <p>Goal Description Promote Home Ownership for Low-Moderate Income Households by providing purchase assistance to first-time low-to-moderate income home buyers who purchase an existing house, or one provided for sale through Acquisition Rehabilitation Programs. Promote Home Ownership for Low-/Moderate Income Households by providing purchase assistance through the Towns' First-time Home Buyer Programs; housing counseling for low-to-moderate income residents in Amherst; creation of new affordable housing through the Amherst and Cheektowaga'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. Assistance to At-Risk Pop/Reduce Homelessness Risk</p>

<p>3</p>	<p>Goal Description</p>	<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 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>Through CDBG funding 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; and assist those who are homeless or may become homeless.</p> <p>Additionally, the Family Justice Center has a satellite office in Amherst to assist victims of domestic violence by providing a safe and secure location with service providers available on-site.</p>
<p>4</p>	<p>Goal Name</p>	<p>Weatherization Assistance</p>
<p>5</p>	<p>Goal Description</p>	<p>Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable housing.</p> <p>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.</p>
<p>5</p>	<p>Goal Name</p>	<p>Affirmatively Further Fair Housing</p>
<p>5</p>	<p>Goal Description</p>	<p>The Town utilizes CDBG funds to 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>5</p>	<p>Goal Name</p>	<p>Historic Preservation/Elimination of Slum & Blight</p>

6	Goal Description	CDBG funding will be available to preserve historic sites and eliminate slum and blight in neighborhoods in the Town of Amherst and the Village of Williamsville.
7	Goal Name	Community Services
	Goal Description	<p>CDBG resources will be used to improve the quality of life for families, youths and seniors in the community by providing afterschool programming, community policing events, senior transportation services, and neighborhood outreach.</p> <p>The Town of Amherst will provide after-school programming with the Boys and Girls Club of Buffalo in the Eggertsville Community Center to serve youths from low-and-moderate income families in the neighborhood.</p> <p>In addition, Amherst Recreation Department and Police Department will hold community policing/public safety events in the Eggertsville neighborhood and at the Senior Center to build better community relationships to the local police force. The Police Department will also provide utilize these events to provide public safety information to area families and seniors.</p> <p>CDBG resources also support the Amherst Senior Center’s wheelchair accessible van utilized to assist individuals with restricted mobility and disabilities.</p>
8	Goal Name	Economic Development/Neighborhood Improvement
	Goal Description	The Town addresses deteriorated neighborhood conditions and support small businesses through the Facade Improvement Program. The program provides a 50% loan and 50% grant toward the rehabilitation of deteriorated facades for businesses that either hire a LMI position or serve a LMI neighborhood based on census tract.
9	Goal Name	Public Facilities and Infrastructure
	Goal Description	CDBG resources will be utilized for investments in public facilities and infrastructure in order to beautify, connect, and revitalize neighborhoods. The Town will invest in sidewalk improvements in accordance with ADA and provide additional Right of Way improvements in low- and moderate-income neighborhoods including signage, benches and beautification efforts. Additionally, CDBG resources will be used to support the conversion of the Glen Park Nature Center to a public pavilion.

Table 87 – Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The Town of Amherst has begun using HOME resources to subsidize the construction of affordable housing units, specifically for special populations. It is estimated that another six (6) units will be constructed and that four (4) of the beneficiary families will be moderate-income individuals and two (2) will be low-income.

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c) Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

There is no public housing in the Towns of Amherst and Cheektowaga. The Kenmore Housing Authority owns and operates two senior citizens housing developments, Kenmore Village Apartments and Theaters Apartments. All units meet ADA standards. No further action needed.

Activities to Increase Resident Involvements

For more than a decade, there has been one apartment set aside in each building that has three computers, a printer and WiFi access. These are used regularly by tenants. No additional activities are planned.

Is the public housing agency designated as troubled under 24 CFR part 902?

The Kenmore Housing Authority is not designated as a troubled agency. HUD average inspection rating in 2018 was 91.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)

Barriers to Affordable Housing

Erie County, The City of Buffalo and the ACT Consortium are completing an Analysis of Impediments to Fair Housing Choice that has identified public and private barriers to affordable housing, while tracking recent efforts to remove or eliminate the barriers and developing an action plan to further and expand upon those efforts.

As discussed in MA-40, there are public policy barriers to affordable housing and residential investment that can be addressed directly by Consortium members. In addition to public policy related issues, the Analysis of Impediments to Fair Housing Choice identified the following barriers within the Consortium:

- Not In My Backyard (NIMBYism)
- Mortgage Lending and Landlord Discrimination
- Market Conditions and Lack of Supply
- Costs to Develop New Housing and Shortage of Funding Available for Affordable Housing

These barriers to affordable housing lead to small concentrations of affordable housing within the Consortium, that are unable to meet the regional demand and are generally limited to Racially or Ethnically Concentrated Areas (R/ECAs). As a result, many of the R/ECAs are also Concentrated Areas of Poverty (CAPs). The resulting Racially or Ethnically Concentrated Areas of Poverty (three in Amherst, three in Cheektowaga, and one in Tonawanda) perpetuate many of the existing barriers to affordable housing in other areas of the Consortium, creating a negative cycle of affordable housing segregation.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The Analysis of Impediments to Fair Housing Choice tracked recent efforts to remove or eliminate the barriers to affordable housing and developed an action plan to further and expand upon those efforts.

Consortium communities are currently utilizing CDBG and HOME resources to stabilize neighborhoods with a high concentration of low-income households such as Eggertsville, Sheridan Parkside, and the Northwest/West Central area of Cheektowaga adjacent to the City of Buffalo. Additionally, Consortium communities are attempting to financially incentivize developers to create new affordable housing units outside of R/ECAPs, such as Amherst's recent use of HOME Funding to leverage Belmont Housing's development of 46 new affordable housing units on Amsterdam Ave and Alberta Drive.

Consortium communities have also adopted Language Access Plans and undertaken extensive outreach initiatives to ensure compliance with affirmative marketing requirements.

The Analysis to Impediments Action Plan recommends the following to increase access to Affordable Housing and Fair Housing Choice within the Consortium:

- Change existing municipal zoning and land use policies to expand opportunities for higher density/multi-family housing where appropriate
- Expand housing choice for low-income households to areas outside of R/ECAPS by increasing HOME funding for projects located in higher-cost/higher-opportunity neighborhoods; requiring that affordable units be incorporated into new market-rate projects; and supporting regional transit planning and expansion of service to access employment centers and services
- Continue to improve quality of life in R/ECAPs where high concentrations of affordable housing exist by investing HOME and CDBG funding in needed infrastructure and economic development projects to expand opportunities and by continuing/expanding rehabilitation assistance to allow homeowners to maintain their homes
- Expand education and outreach to increase the geographic spread and supply of affordable housing options throughout the Consortium communities, including assisting developers pursuing LIHTC projects; continuing to partner with organizations who provide fair housing programming to landlords, tenants, and real estate professionals; ensuring information is provided in languages other than English
- Support implementation of Erie County's Fair Housing Law
- Support regional coordination to address housing and related challenges across jurisdictions, including conducting regular meetings between Fair Housing Offices and other housing providers to coordinate activities and actions and consider creating a regional Housing Task Force to implement strategies to remove barriers to affordable housing
- Support homeless service providers and the expansion of housing opportunities by reviewing ordinances to ensure transitional housing and other services are allowed in appropriate areas; providing additional support to homeless service providers; and working with regional partners to ensure that services are available across Erie County

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Town does not receive any direct homelessness assistance (i.e. Emergency Solutions Grant program funding) but relies on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Section 8 Housing Choice Voucher program and emergency housing assistance.

Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for several people identified as homeless in the Town. Amherst's Meals on Wheels Program has also assisted in these cases, to provide daily meals. The Five-Year Consolidated Plan and Annual Action Plan goals address assisting frail elderly and those at risk of homelessness, including domestic violence victims.

Hearts for the Homeless emergency shelter continues to operate a mobile shelter. The mobile shelter travels throughout the Towns and the City of Buffalo to find homeless people on the street and provide food and clothing. At that time, the homeless are assessed as to their needs and referred to proper agencies.

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

Youth homelessness is a topic being addressed by agencies in the City of Buffalo and first ring suburbs. Homeless youth have different needs than adults, and different ways of accessing services. There are few programs in place to assist youth homelessness, but it is a topic being explored. In addition, for those with alcohol or other drug addictions, although there has been a decline in the amount of opioid related deaths, there are still those in the community that need help in dealing with addiction.

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 all work together to identify the homeless, assess their needs, and refer them to the appropriate agency.

The Homeless Alliance of WNY (HAWNY) is the umbrella organization that coordinates funding, services and collaboration among area agencies and services for the homeless. HAWNY convenes regular meetings between the various agencies and advises the Town on homeless issues and related outreach efforts.

Addressing the emergency and transitional housing needs of homeless persons

Law enforcement is available to assist victims of domestic violence in emergency situations through the Town of Amherst Police Department Family Offense Squad. CDBG funds have provided support through the YWCA for four units of Transitional Housing in the Town for families re-establishing themselves after the disruption of domestic violence. CDBG funds have also been allocated in prior program years to the Northtown Satellite Office of the Family Justice Center in Amherst for safety and security improvements to their facility, which provides assistance to individuals and families escaping domestic violence. CDBG funds could be used to further assist the Family Justice Center through outreach efforts and needed facility improvements.

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 has developed programs that assist existing low- and moderate-income residents so that they can maintain their current residential assets. This included homeowner rehabilitation assistance and weatherization assistance for owners.

The ACT Consortium will maintain coordination and collaboration with local non-profit agencies serving the homeless population and will continue to use its CDBG and ESG funds to assist non-profit organizations that serve homeless individuals and families in the region. Each year, the Homeless Alliance has made progress towards ending chronic homelessness, 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.

Furthermore, the CoC will continue to provide training opportunities throughout the year for providers to learn eligibility requirements and referral processes for non-cash benefits (ie. SNAP, Medicaid, etc.) Monthly meetings with Erie County Department of Social Services (DSS) staff and homeless providers will continue to be held to discuss and resolve issues that have been identified as barriers to accessing mainstream resources. Eligibility for non-cash benefits will be assessed through the Coordinated Entry system.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The Town is an active participant in the Erie County Fair Housing Partnership, which provides a forum to identify current fair housing issues. The Partnership deals with such issues as sub-prime lending activities, fair housing laws and lobbying for their passage, and coordinated counseling and foreclosure prevention services. The Partnership also produces a series of activities for fair housing month each spring. Community Development staff has worked with the Partnership to develop workshops on mortgage loans, mortgage modification, foreclosure prevention and landlord training to better prepare and educate, homebuyers, homeowners, landlords and tenants. In April 2018

The Town of Amherst with Housing Opportunities Made Equal held a landlord/tenant training in Town Hall. Also, in 2018, a new law that was created by the Erie County Fair Housing Partnership and adopted by the Erie County Executive and Legislators, prohibits discrimination based on a person's source of income for all Erie County residents in the sale or rental of housing.

The Town has contracted for the provision of housing counseling activities to homebuyers, homeowners and renters. The counseling educates 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.

Housing counseling services are provided through Belmont Housing Resources for WNY, Inc. and Buffalo Urban League. Belmont primarily provided credit and mortgage default counseling and the Urban League provides legal assistance for foreclosure prevention and loan modification for homeowners at risk of losing their homes through job loss, costly medical bills, etc.

The Town also includes CDBG funding in the annual budget to provide staffing for the Boys & Girls club afterschool program, located in the Eggertsville Community Center. This program offers educational and social programs for children and young teens from low income facilities, both early morning and afternoon, providing them with a safe and fun environment.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The primary source of information for obtaining information and actions to address LBP hazards was a meeting with representative of Erie County Department of Health. Actions include:

NYS Lead Based Paint Prevention Program

This is a core program funded by the State for identification and mitigation of elevated lead paint. This is a 5-year contract which is funded annually for \$500,000 to \$550,000 per year.

Elevated blood levels (EBL) in children is the most critical issue in dealing with lead-based paint. The State required the Erie County Department of Health to respond to all cases with elevated blood levels.

This involves case management with a nurse and follow-up referral to primary care physician

Healthy Neighborhood Program

Funded by a NYS grant, this program has been operated by DOH for about 30 years. The program is continuing to be funded on a 5-year contract with the State, payable at about \$300,000 per year. Grant levels have stayed about the same for several years, which means some erosion with the effect of inflation.

The program conducts door-to-door complete “sweeps” of designated high-risk neighborhoods. The County has identified 12 high-risk areas by ZIP code. This includes eleven ZIP codes in the City of Buffalo, including three ZIP codes which overlap with Cheektowaga – 14211, 14212, and 14215. The 12th ZIP code is entirely in the City of Lackawanna.

Each year, DOH selects a total of two or three Census tracts which are within these 12 high-risk ZIP code areas for doing complete door-to-door sweeps. Census tracts are chosen based on assessment of at-risk population including income, number of children, number of renters and other socio-economic data.

Two field staff are assigned to this program and conduct about 1,000 interventions where the DOH rep has gained access to the residential unit. Most units are renter occupied. In addition to checking for lead based paint hazards, the inspector also checks for indoor air safety, potential asthma problem and potential unintentional injury hazard. As needed, DOH will provide smoke detectors, carbon monoxide detectors, and provide general assessment of healthy living condition.

Visits are preceded by a general notification to the neighborhood that a sweep will be conducted.

DOH cited that the City of Buffalo in recent years has demolished several homes in high-risk ZIP codes 14211 and 14212, which helped to remove properties that most likely had LBP hazards.

LEADSAFE Erie County Lead Hazard Control Program

This program is fund through HUD. The current grant of \$3 million ended in October 2019. A new grant application has been submitted to HUD.

Homeowners participating in the program must contribute towards the cost of mitigating lead-based paint hazards. Although they may have to pay up to a maximum of 12% of the total hazard control cost, in most instances the cost is \$150-250. On an average about 70 units per year are assisted under this program

Although the program is available County-wide, about 75-80% of the grants are made to homeowners within high-risk ZIP code areas. Homeowners must have an income which is below 80% of the median income of the area and have at least one child under age 6 living in the unit.

The County had also received a supplemental grant from HUD for \$400,000, which could be used for needed non-LBP hazard mitigation such as a new furnace, moisture control, etc.

Child Lead Poisoning Primary Prevention Program.

The Department of Health receives \$1.1 million per year from the State for this program. The strategy of the program is to identify pre-1978 homes and provide remediation prior to LBP hazards developing. For example, the County will work with owners using Section 8 to take action to remediate property prior to Section 8 occupancy. This program services about 1,200 homes per year within the 12 high risk ZIP code areas.

Erie County Child Lead Poisoning Primary Prevention Program

Starting in 2016, Erie County approved \$3 million to fund a Child Lead Poisoning Primary Prevention Program outside the “high-risk” ZP code areas over a five-year period. This program serves about 800 households per year.

Removal, Remodel, Painters Program (RRP)

Anyone who is planning to work on a house with County funds to mitigate LBP hazards is required to take a County sponsored training program. The County sponsors three to five training session per month.

This training program is open to anyone who is planning to do renovation or remodeling work on homes built prior to 1978. In addition to high risk areas, this program extends to homeowners outside of the high-risk areas, who may own higher priced homes and intend to do renovation and remodeling work. Although higher priced homes may not have flaking lead-based paint present, renovation and remodeling work that may be undertaken would disturb existing paint and result in lead-based paint dust.

Approximately 2,500 persons per year are trained under this program. Most of those trained would be undertaking private renovation and remodeling.

Awareness, Education, and Prevention

The Department of Health continues its long-standing relationship with the nonprofit Community Foundation of Greater Buffalo. CFGB undertakes significant outreach efforts, networks with various agencies and partners with other organizations in lead-based paint prevention.

CFGB also heads a task force for LBP prevention and mitigation. The task force is comprised of various stakeholders, the City of Buffalo, the Department of Health, Buffalo School systems and others.

While the Erie County Department of Health deals with the day-to-day issue of responding to calls on elevated blood levels and lead-based paint remediation and prevention, the Community Foundation is a critical partner with the Erie County Department of Health as a leader in awareness, education and prevention.

How are the actions listed above integrated into housing policies and procedures?

As outlined above, dealing with the risk assessment of lead-based paint hazards involves (1) Response, (2) Outreach contact and (3) Awareness, Education and Prevention.

The most important role for the Erie County Department of Health is to respond immediately to every call received about a lead-based paint hazard risk and take appropriate remedial action. Within the ACT Consortium there were 17 environmental investigations and inspection referrals for elevated blood level (EBL) made in 2018. With a much older housing stock, the incidence within the City of Buffalo was much higher with 433 such cases. The threshold level for EBL referral was EBL of 10 mcg/dl or higher. As of October 1, 2019, the State lowered the threshold level and now requires investigation and action for any finding of 5mcg/dl or higher.

The second basic responsibility of Erie County DOH is to undertake outreach efforts to specifically identify properties which have lead-based paint risk hazards or are candidates for lead-based paint prevention. The above programs involved in these activities service about 3,000 households per year, with a significant concentration in 12 high-risk Census tracts, mostly within the City of Buffalo.

Awareness, Education and Prevention are critical to making the broader public aware of lead-based paint hazards and increasing their awareness of how to prevent lead-based paint hazards. The Community Foundation of Greater Buffalo has and continues to play a critical role in this effort. Also, the training program under Removal, Remodel, Painters Program (RRP) reaches about 2,500 participants per year, well beyond the number of individuals seeking assistance through County rehab programs.

How are the actions listed above integrated into housing policies and procedures?

All rehabilitation housing applications submitted to the ACT Consortium Community Development Departments are reviewed for the lead-based paint risk assessment. Compliance includes visual assessments, verbal questioning during the intake and written questions on the application form. All housing cases include a visual assessment for lead-based paint hazards, including peeling, cracking, chipping or flaking paint.

If the unit meets the LBP hazard threshold, the unit is then inspected by an outside contractor specialist to assess the condition in detail and specify remediation action required. Upon completion of remediation, the same contractor performs a clearance inspection.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Citizen Participation process undertaken as a part of the Consortium's Consolidated Planning effort included meetings with representatives from a variety of regional agencies, health and human services providers, and a variety of other stakeholders working in fields that either overlap or directly deal with poverty-level families. The repeated message was that reducing poverty require a wholistic approach. The Town of Amherst identified goals and priorities reflect the Town's commitment to addressing poverty with a variety of policies and programs addressing issues of economic development, affordable housing, public services (especially for at-risk populations) and reducing the risk of homelessness, such as housing counseling, foreclosure prevention, and fair housing counseling.

In addition, the Erie County Department of Social Services serves the Consortium communities and has multiple programs designed to reduce the number of people living below the poverty level including employment programs, welfare reform, educational programming, and family preservation initiatives. The Department relies heavily on direct contact with other agencies, many of which seek to find employment for Temporary Assistance (TA) recipients. A few of these agencies are the New York State Department of Labor, the Buffalo and Erie County Workforce Development Consortium, and area school districts.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The Analysis to Impediments Action Plan made a series of recommendations to increase access to affordable housing and Fair Housing Choice within the Consortium. Policy recommendations consistent with the Town of Amherst's poverty reducing goals and programs, include:

- Change existing municipal zoning and land use policies to expand opportunities for higher density/multi-family housing where appropriate
- Expand education and outreach to increase the geographic spread and supply of affordable housing options throughout the Consortium communities, including assisting developers pursuing LIHTC projects; continuing to partner with organizations who provide fair housing programming to landlords, tenants, and real estate professionals; ensuring information is provided in languages other than English
- Support implementation of Erie County's Fair Housing Law
- Support regional coordination to address housing and related challenges across jurisdictions, including conducting regular meetings between Fair Housing Offices and other housing providers to coordinate activities and actions and consider creating a regional Housing Task Force to implement strategies to remove barriers to affordable housing
- Support homeless service providers and the expansion of housing opportunities by reviewing ordinances to ensure transitional housing and other services are allowed in appropriate areas;

providing additional support to homeless service providers; and working with regional partners to ensure that services are available across Erie County

Additionally, the Town of Amherst is already utilizing financial resources in accordance with recommendations to improve the supply of affordable housing and the quality of life in areas with a higher concentration of affordable housing. The use of CDBG and HOME resources as outlined below are a strong example of coordinating poverty reduction policies with this affordable housing plan.

- Expand housing choice for low-income households to areas outside of R/ECAPS by increasing HOME funding for projects located in higher-cost/higher-opportunity neighborhoods; requiring that affordable units be incorporated into new market-rate projects; and supporting regional transit planning and expansion of service to access employment centers and services
- Continue to improve quality of life in R/ECAPs where high concentrations of affordable housing exist by investing HOME and CDBG funding in needed infrastructure and economic development projects to expand opportunities and by continuing/expanding rehabilitation assistance to allow homeowners to maintain their homes

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Town of Amherst monitors its subrecipients (including the Towns of Cheektowaga and Tonawanda and CDBG partners) and housing development agencies according to HOME and CDBG requirements and established policy. The Town uses a combination of remote assessment/assistance and annual on-site review to conduct performance evaluations for each entity. Because monitoring of activities is conducted on an ongoing basis, there have been no significant issues that need to be resolved. Rather, community development staff works with program participants to “fine-tune” procedures to facilitate improvements in communication, coordination and management.

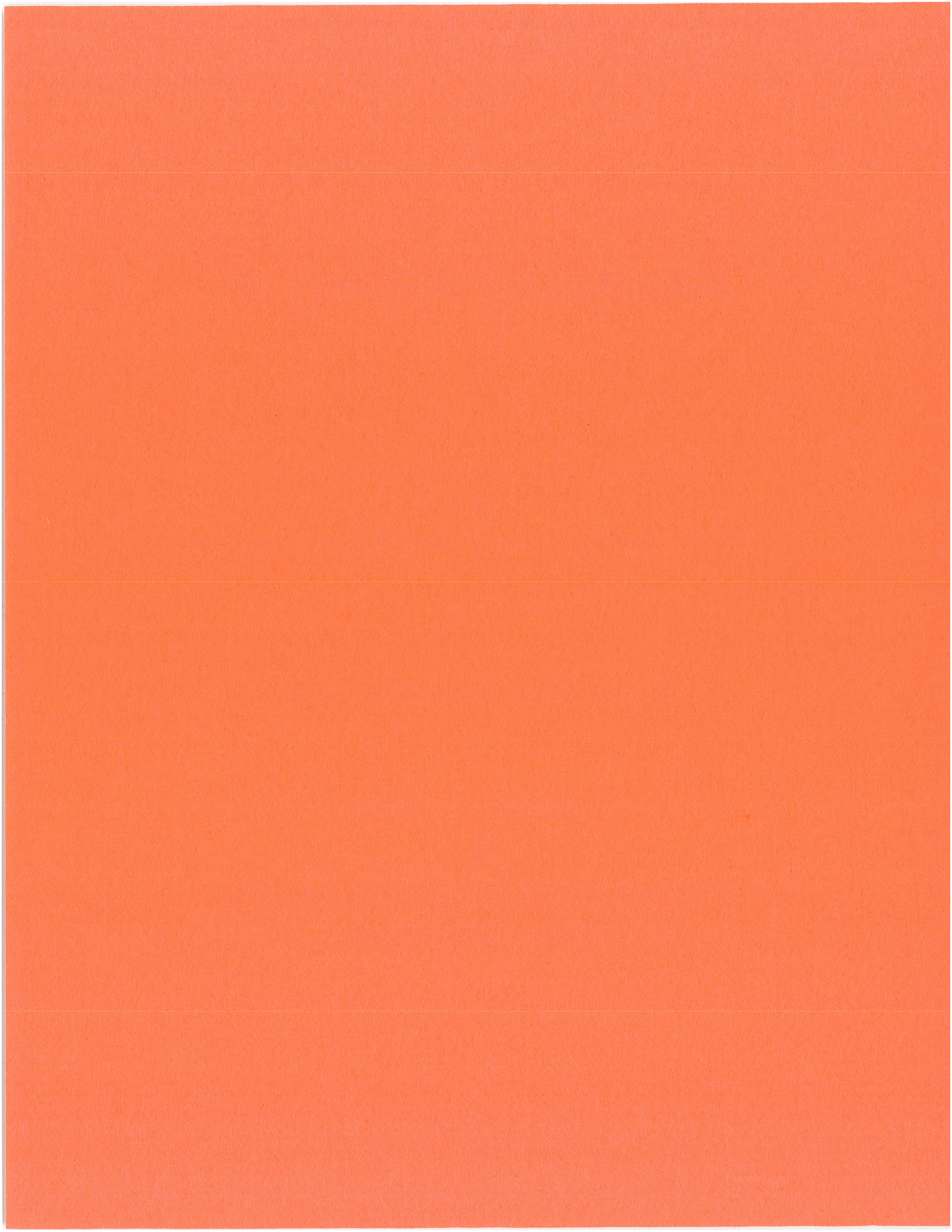
M/WBE outreach in the previous year included direct outreach via letter to minority and women-owned businesses in the area. This outreach resulted in a couple new M/WBE contractors being added to our contractor list. The developer for 26 Meadow Lea Drive also advertised in minority newspapers for the rehabilitation of the home and advertised the sale in minority newspapers as well. The two minority newspapers in the area are the Panoramio Hispano, The Challenger, and Buffalo Criterion

2020 ANNUAL ACTION PLAN

**Community Development Block Grant
&
HOME Investment Partnerships (HOME) Program**

April 1, 2020 - March 31, 2021

**Town of Amherst
&
Amherst-Cheektowaga-Tonawanda
HOME Consortium**





ANNUAL ACTION PLAN FY 2020

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

April 1, 2020 - March 31, 2021

Town of Amherst Community Development



Annual Action Plan

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

Introduction

The Town of Amherst will receive \$550,000 in Community Development Block Grant funding for 2020, with roughly \$150,000 in program income received during the program year. The Amherst, Cheektowaga, Tonawanda (A-C-T) HOME Consortium will receive \$800,000 in 2020 HOME Investment Partnerships Grant funding, with an anticipated \$700,000 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 or decreases 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: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	550,000	150,000	700,000	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			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	800,000	700,000	0	1,500,000	0

Table 88 - 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 2018 that offers eligible single family homeowners a forgivable grant amount toward the rehabilitation of their home. The grant matches the Town's CDBG or HOME rehabilitation funds 60/40. The CDBG or HOME portion of the assistance is offered as a 0% deferred loan, to be repaid at sale or transfer of the property, or if the homeowner no longer permanently resides in the home. It typically takes three years for Amherst to utilize all of the NYS grant funds.

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

N/A

Discussion

N/A

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	2021	Affordable Housing	Town Wide Egbertsville	Acquisition Rehabilitation Resale Handicapped Accessibility Residential Rehab- Owner occupied Rental Residential Rehab- Owner-Occupied Military Grant Residential Rehabilitation-Owner- Occupied HOME Construction Rental Subsidy - Special Populations	CDBG: \$232,300 HOME: \$370,000	Homeowner Housing Rehabilitated: 25 Household Housing Units Rental units rehabilitated: 1 Household Housing Units Special Population Housing constructed: 1 Unit
2	Promote Affordable Homeownership	2020	2021	Affordable Housing	Egbertsville Town Wide	Homebuyer Assistance for Affordable Hsg Acquisition- Rehabilitation/New Construction- Resale	CDBG: \$30,000 HOME: \$380,000	Direct Financial Assistance to Homebuyers: 4 Households Assisted Homeowner Housing Added: 1 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Provide Assistance to At-Risk Population	2020	2021	Affordable Housing Homeless Non-Homeless	Town Wide Egbertsville	Assist Victims of Domestic Violence Hsg Counseling & Foreclosure Prevention Assist Weatherization Assistance	CDBG: \$52,000	Homelessness Prevention: 150 Persons Assisted
4	Weatherization Assistance	2020	2021	Affordable Housing	Town Wide	Weatherization Assistance	CDBG: \$14,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
5	Affirmatively Further Fair Housing	2020	2021	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG: \$10,000	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
6	Historic Preservation/Elimination of Slum & Blight	2020	2021	Preservation	Town Wide	Historic Preservation	CDBG: \$28,500	Facade treatment/business building rehabilitation: 1 Business
7	Community Services	2020	2021	Non-Housing Community Development	Egbertsville Town Wide	Community Policing Public Services - Youth Services Senior Services	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Public Facilities and Infrastructure	2020	2021	Non-Housing Community Development	Town Wide, Eggertsville, Opportunity Zone	Neighborhood Beautification/Public Infrastructure	CDBG: \$30,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Table 89 – Goals Summary

Goal Descriptions

1	Goal Name	Improve Housing Stock
	Goal Description	<p>Amherst will utilize CDBG resources to improve and maintain quality affordable housing stock through funding for maintenance and rehabilitation of (i) existing owner-occupied low-income rental housing, (ii) existing renter-occupied low-income housing, (iii) Military Veteran household units, (iv) and households in need of improvements for handicapped accessibility.</p> <p>Conduct homeowner rehabilitation for ten extremely low-income, fifteen low-income, nine moderate-income, and three Military Veteran households through the Towns' Housing Rehabilitation Program. The programs improve and maintain quality affordable housing stock within the Towns of Amherst, Cheektowaga and Tonawanda.</p> <p>CDBG: Amherst \$362,300 (includes \$122,000 Program Income)</p> <p>HOME: Amherst \$130,000 (\$30,000 in Program Income); Tonawanda \$220,000 (\$100,000 in Program Income); Cheektowaga \$120,000 (EN Only)</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>Both Amherst and Cheektowaga 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 5 HOME subsidized units, assisting 5 households.</p> <p>HOME: Amherst \$100,000 in prior years PI HOME funds are allocated.</p> <p>HOME: Cheektowaga \$400,000 in PI HOME funds are allocated.</p>

<p>2</p>	<p>Goal Name</p> <p>Promote Affordable Homeownership</p> <p>Goal Description</p> <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.</p> <p>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. The First-Time Homebuyer Program goals and HOME funding is indicated below:</p> <p>HOME: Cheektowaga – Assist 4 homebuyers; \$0 allocated, as \$47,592 remains in prior years allocations.</p> <p>HOME: Amherst - Assist 4 homebuyers; \$0 allocated, as \$35,840 remains in prior years allocations.</p> <p>HOME: Tonawanda – Assist 3 homebuyers; \$20,000 allocated, with \$24,374 remaining in prior years allocations.</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 three households with this opportunity in 2020. The HOME funding for the Acquisition-Rehab/New Construction/Resale Program is allocated accordingly:</p> <p>CDBG: Amherst - \$30,000 for acquisition only</p> <p>HOME: Amherst - \$200,000 (includes \$60,000 in Program Income), prior years program income will also be applied.</p> <p>HOME: Cheektowaga - \$210,000 (includes \$90,000 in Program Income), prior years program income will also be applied.</p> <p>HOME: Tonawanda - \$100,000</p>
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3		Provide Assistance to At-Risk Population
Goal	Description	<p>Provide assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless. Amherst's CDBG funding will be utilized to provide public services through the YWCA of WNY, Belmont Housing Resources for WNY, and Buffalo Urban League to prevent homelessness of certain at-risk populations. Also, Amherst will assist the Family Justice Center with facility improvements and Outreach to Teens regarding intimate partner violence. The Family Justice Center serves victims of domestic violence and has a satellite office in Amherst.</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>Amherst will utilize CDBG funding to provide this assistance and aims to assist 200 households.</p> <p>CDBG: Amherst - \$8,000 Buffalo Urban League</p> <p>CDBG: Amherst - \$25,000 YWCA</p> <p>CDBG: Amherst - \$16,500 Belmont Housing Resources for WNY</p> <p>CDBG: Amherst - \$3,000 Family Justice Center</p>

4	<p>Goal Name Weatherization Assistance</p> <p>Goal Description Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable housing.</p> <p>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 an administration fee (\$200) per unit assisted.</p> <p>CDBG: Amherst – 50 units assisted, \$14,000 allocated</p>
5	<p>Goal Name Affirmatively Further Fair Housing</p> <p>Goal Description Ensure access to fair, safe and affordable housing for all residents and strive to prevent discrimination in housing and the workplace.</p> <p>Amherst, through CDBG funding, provides fair housing counseling services via Housing Opportunities Made Equal. Housing Opportunities Made Equal provides education and enforcement action for fair housing and landlord tenant disputes and reports perceived discrimination in housing and employment.</p> <p>CDBG: Amherst - \$10,000 Allocated</p>
6	<p>Goal Name Historic Preservation/Elimination of Slum & Blight</p> <p>Goal Description Address buildings and public facilities in need of repair in order to eliminate neighborhood slum and blight.</p> <p>Currently the Village of Williamsville has identified 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 2020 share (7%) of CDBG funding to stabilize this Historic Landmark structure. .</p> <p>CDBG: Williamsville - \$28,500 allocated.</p>

7	Goal Name	Community Services
	Goal Description	<p>Improve the quality of life for families and youths and seniors in the community by providing afterschool programming, and community policing events.</p> <p>The Town of Amherst will provide after-school programming with the Boys and Girls Club of Buffalo in the Eggertsville Community Center to serve youths from low-and-moderate income families in the neighborhood. The after-school programs are expected to benefit over 50 children in 2020.</p> <p>CDBG: Amherst - \$37,000 allocated</p> <p>In addition, Amherst Recreation Department and Police Department will hold community policing/public safety events in the Eggertsville neighborhood and at the Senior Center to build better community relationships to the local police force. The Police Department will also provide utilize these events to provide public safety information to area families and seniors. The Community Policing events will be provided by CDBG funding and serve approximately 200 people in our target neighborhoods.</p> <p>CDBG: Amherst - \$8,000 allocated</p>
8	Goal Name	Public Facilities and Infrastructure
	Goal Description	<p>CDBG Public Infrastructure for PY 2020 will focus on the Village of Williamsville’s conversion of the Glen Park Nature Center into an open air pavilion. Currently the building is underutilized and the conversion will open up its usage.</p> <p>\$10,000 from the Village’s CDBG allocation is allocated to the project.</p> <p>Amherst will also replace in-accessible sidewalks with ADA compliant ramps within the Eggertsville and Opportunity Zone target areas. Ramps will be installed in conjunction with sidewalk repairs. \$20,000 is allocated to ADA sidewalk ramps for PY 2020.</p>

Table 90 – Goal Descriptions

AP-35 Projects - 91.420, 91.220(d)

Introduction

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

#	Project Name
1	Amherst CDBG Housing Rehabilitation
2	CDBG 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 H.O.M.E.
10	Boys and Girls Club Afterschool Program
11	Village of Williamsville Section House
12	Village of Williamsville Glenn Park Nature Center Conversion
13	YWCA, Inc. Transitional Housing
14	Community Policing Engagement Events
15	Family Justice Center Signage & Outreach
16	ADA Sidewalk Ramps
17	Amherst Housing Rehabilitation (HOME) funds
18	Amherst First-time Homebuyer Program (HOME)
19	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME & CDBG)
20	Amherst HOME Rental Subsidy
21	Amherst HOME Administration
22	Tonawanda Acquisition-Rehabilitation/New Construction-Resale (HOME)
23	Tonawanda Residential Rehabilitation (HOME)
24	Tonawanda First-time Homebuyer Closing Cost Assistance (HOME)
25	Tonawanda HOME Administration
26	Cheektowaga Housing Rehabilitation (HOME)
27	Cheektowaga CHDO Acquisition-Rehabilitation/Acquisition-New Construction/Resale (HOME)
28	Cheektowaga First-time Homebuyer Program (HOME)
29	Cheektowaga HOME Administration
30	Cheektowaga HOME Rental Subsidy

Table 91 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	Amherst CDBG Housing Rehabilitation
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A Residential Rehab-Owner occupied Rental *A Handicapped Accessibility *A Residential Rehab-Owner-Occupied Military Grant *A
	Funding	CDBG: \$232,300
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. (\$102,300 CDBG Rehab; \$130,000 Rehab Payroll - total \$232,300); Anticipated \$122,000 CDBG Program Income received FY20 to supplement entitlement funds. CDBG housing rehab for 2020 will be accomplished with entitlement funds and program income. The Town's State AHP Grant will supplement the funding in target areas.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will benefit from this program.
	Location Description	Town-wide. If additional state grant funds are received, they'll be applied as match to target areas.
	Planned Activities	HUD Matrix Code 14A Housing rehabilitation for needed repairs to bring properties to code and provide safe secure housing units. These repairs may include structural or mechanical systems such as roofing, siding, insulation, windows, doors, electrical and plumbing.
2	Project Name	CDBG General Program Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A

	Funding	CDBG: \$96,500
	Description	These funds are used for staff administration of the CDBG Grant. \$96,500 will be utilized from entitlement funding and \$28,000 from anticipated program income.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21A Administration of all CDBG funded activities.
3	Project Name	CDBG Office Expenses
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$1,200
	Description	Office supplies, copying costs and mailing expenses for administration of CDBG Programming.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21B General office supplies
4	Project Name	Public Information and Advertising
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A

	Funding	CDBG: \$2,000
	Description	Advertising for Public Hearings, the availability of funds, reports, plans, and other housing activities or opportunities associated with the federal grants received by the Town.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21C Advertising for Public Hearings, the availability of funds, reports, plans, and other housing activities or opportunities associated with the federal grants received by the Town.
5	Project Name	Lead Based Paint Testing and Clearance
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A Residential Rehab-Owner-Occupied Military Grant *A Residential Rehab-Owner occupied Rental *A Handicapped Accessibility *A
	Funding	CDBG: \$8,000
	Description	Lead-based paint risk assessment/evaluation for CDBG and HOME rehabilitation activities and clearance testing after repairs.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 15 properties will be inspected and cleared after repairs are completed to assure that there is no presence of lead-based paint.
	Location Description	Town-wide

	Planned Activities	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	Project Name	Weatherization Program for Single Family Homes
	Target Area	Town Wide
	Goals Supported	Weatherization Assistance
	Needs Addressed	Weatherization Assistance *A
	Funding	CDBG: \$14,000
	Description	Create more energy efficient housing units for low-moderate income homeowners by providing energy audits resulting in as-needed energy efficient furnaces, insulation, windows and, in some cases, energy efficient refrigerators. The energy savings will assist in creating a more affordable housing environment throughout the Consortium. A total of \$14,000 in CDBG funding will pay for a \$200 administration fee per unit assisted.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 housing units will be assisted with weatherization services.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14F Housing rehabilitation with the sole purpose of improving energy efficiency.
7	Project Name	Belmont Housing Counseling Services
	Target Area	Town Wide
	Goals Supported	Provide Assistance to At-Risk Population
	Needs Addressed	Hsg Counseling & Foreclosure Prevention Assist *A
	Funding	CDBG: \$16,500

	Description	Belmont Housing Resources for WNY, Inc. is a HUD certified counseling agency that will provide tenant, pre-purchase, post-purchase, foreclosure, reverse mortgage and mortgage default counseling services to low-moderate income residents.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	~150 households or individuals will benefit from the counseling and financial education offered by the program.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code: 05K 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	Project Name	Buffalo Urban League Foreclosure Prevention Services
	Target Area	Town Wide
	Goals Supported	Provide Assistance to At-Risk Population
	Needs Addressed	Hsg Counseling & Foreclosure Prevention Assist *A
	Funding	CDBG: \$8,000
	Description	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.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will benefit from the credit counseling and foreclosure prevention services offered by the Buffalo Urban League.
	Location Description	Town-wide

	Planned Activities	HUD Matrix Code 05C Buffalo Urban League provides counseling on mortgage modification and foreclosure prevention, and provides the legal services needed to assist homeowners to remain in their homes through the loan modification process.
9	Project Name	Fair Housing Counseling through H.O.M.E.
	Target Area	Town Wide
	Goals Supported	Affirmatively Further Fair Housing
	Needs Addressed	Fair Housing Counseling *A
	Funding	CDBG: \$10,000
	Description	Housing Opportunities Made Equal, Inc. (HOME) will advocate for victims of perceived housing discrimination and offer informational workshops on discrimination to Town Officials. Advertising for Fair Housing issues will also be handled by HOME and a link to their website is on the Town's Community Development page: www.amherst.ny.us/community (under Fair Housing). A landlord-tenant training and fair housing video are typically scheduled in the Town as a Fair Housing Month activity.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 120 individuals will be assisted through the education, advocacy and enforcement assistance offered by Housing Opportunities Made Equal, Inc.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 21D The counselors and legal staff of Housing Opportunities Made Equal offer services to current and potential residents of the Town who feel they are victims of discrimination in housing and employment. The staff also provides information about landlord and tenant rights and mitigation in rental disputes if needed. HOME provides the enforcement of the Fair Housing Act to ensure that all persons are treated equally in their desire for affordable safe and secure housing in Amherst.
10	Project Name	Boys and Girls Club Afterschool Program
	Target Area	Eggertsville
	Goals Supported	Community Services

	Needs Addressed	Public Services - Youth Services *A
	Funding	CDBG: \$37,000
	Description	The Boys & Girls Club Program serves low income youth residing in Allenhurst Apartments, Princeton Court Apartments, and other Eggertsville neighborhoods adjacent to the Windermere Elementary School area (a target area for the town). The after-school program provides educational, social and recreational opportunities to approximately 55 children per day, designed to support the families and enhance the children's potential to succeed in school and the community, in a safe environment for the children. CDBG funds will cover the cost of staff for the after-school program.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 youth from low-mod households will be assisted at the Eggertsville Community Center after school program each day and the summer program.
	Location Description	Eggertsville
	Planned Activities	HUD Matrix Code 05D The After School Program provides educational, social and recreational programs for children in a safe environment. CDBG funding covers the cost of staff people for the after school activities.
11	Project Name	Village of Williamsville Historic Section House
	Target Area	Town Wide
	Goals Supported	Historic Preservation/Elimination of Slum & Blight
	Needs Addressed	Historic Preservation *A
	Funding	CDBG: \$28,500
	Description	The Village of Williamsville is allocated 7% of Amherst's annual CDBG funding. Funding will be directed to stabilizing the Historic Village Section House on the former railroad line within the Village. The Village has decided to commit their CDBG allocation to this activity. Any increase or decrease in CDBG funding will be reflected in this share of CDBG funding.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	5,300 residents of the Village of Williamsville, and the population of residents in the Town of Amherst who live and/or work near Williamsville.
	Location Description	The Historic Section House is located on a former rail line south of Main Street in the Village of Williamsville.
	Planned Activities	HUD Matrix Code 16B The project will cover the needed repointing of the brick of the Village Meeting house in conjunction with the Village of Williamsville's New York State Historic Preservation Grant to restore Landmark status buildings.
12	Project Name	Village of Williamsville Glenn Park Nature Center Conversion
	Target Area	Town Wide
	Goals Supported	Public Facilities
	Needs Addressed	Neighborhood Beautification/Public Infrastructure
	Funding	CDBG: \$10,000
	Description	The Village of Williamsville is allocated 7% of Amherst's annual CDBG funding. \$10,000 of the funding will be directed to converting the underutilized Glenn Park Nature Center building into an open-air pavilion for residents to better utilize.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	5,300 residents of the Village of Williamsville, and the population of residents in the Town of Amherst who live and/or work near Williamsville.
	Location Description	Glenn Park within the Village of Williamsville
	Planned Activities	HUD Matrix Code 03F The project will convert the Glen Park Nature Center building into an open air pavilion so that it can be utilized for resident recreation purposes.
13	Project Name	YWCA, Inc. Transitional Housing
	Target Area	Town Wide
	Goals Supported	Provide Assistance to At-Risk Population

	Needs Addressed	Assist Victims of Domestic Violence *A
	Funding	CDBG: \$25,000
	Description	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.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Four households.
	Location Description	Creek woods neighborhood.
	Planned Activities	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.
14	Project Name	Community Policing Engagement Events
	Target Area	Town Wide
	Goals Supported	Community Services
	Needs Addressed	Community Policing *A
	Funding	CDBG: \$6,000
	Description	The Amherst Police Department together with the Amherst Recreation Department will continue to build relationships with area youth through community events with the police, such as movie nights, basketball games, etc. The Community Policing activities are expected to reach over 200 people.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	The events will be held in LMI Census tracts and serve families with children within these areas. Approximately 200 people are expected to benefit from the events held.
	Location Description	Eggertsville, Town-wide
	Planned Activities	HUD Matrix code O5I Crime Awareness/Prevention Promotion of crime awareness and prevention, including crime prevention education programs and paying for security guards.
15	Project Name	Family Justice Center Signage & Outreach
	Target Area	Town Wide
	Goals Supported	Provide Assistance to At-Risk Populations
	Needs Addressed	Assist Victims of Domestic Violence
	Funding	CDBG: \$3,000
	Description	The Family Justice Center will improve their facility serving victims escaping domestic violence with better parking signage and shelving systems to manage donations onsite, as well as provide outreach to young adults at risk for intimate partner violence, abuse and dating violence.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 120 Victims and Students will be served by the programming.
	Location Description	Town Wide
	Planned Activities	HUD Matrix code O5G Services for victims of domestic violence, dating violence, sexual assault or stalking.
16	Project Name	ADA Sidewalk Ramps
	Target Area	Eggertsville Opportunity Zone
	Goals Supported	Public Facilities and Infrastructure

	Needs Addressed	Neighborhood Beautification/Public Infrastructure Handicapped Accessibility
	Funding	CDBG: \$20,000
	Description	Replace in-accessible sidewalks with ADA compliant ramps within the Eggertsville and Opportunity Zone target areas. Ramps will be installed in conjunction with sidewalk repairs.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 area residents will be served by the ADA improvements.
	Location Description	Eggertsville Opportunity Zone
	Planned Activities	HUD Matrix code 03L Improvements to sidewalks.
17	Project Name	Amherst Housing Rehabilitation (HOME)
	Target Area	Town-wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A Residential Rehab-Owner occupied Rental *A Handicapped Accessibility *A Residential Rehab-Owner-Occupied Military Grant *A
	Funding	HOME: \$100,000
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. Anticipated \$100,000 HOME EN and \$30,000 HOME Program Income received FY20 to supplement entitlement funds. The Town's State AHP Grant will supplement the funding in target areas.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will be assisted.

	Location Description	Town wide
	Planned Activities	HUD Matrix Code 14A Housing rehabilitation for needed repairs to bring properties to code and provide safe secure housing units. These repairs may include structural or mechanical systems such as roofing, siding, insulation, windows, doors, electrical and plumbing.
18	Project Name	Amherst First-time Homebuyer Program (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Homebuyer Assistance for Affordable Hsg *A
	Funding	HOME:
	Description	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 2019 HUD Income Guidelines. This activity will be supplemented with HOME program income received from previous closing cost assistance loans. No HOME EN funds will be applied to this program in 2020, as \$35,840 remains from prior year allocations.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately four five time homebuyer households will be assisted in 2020. Previous years' funding available.
	Location Description	Town-wide
	Planned Activities	Matrix Code 13 Direct Homeownership assistance to LMI households.
19	Project Name	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME & CDBG)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Acquisition Rehabilitation Resale *A
	Funding	CDBG: \$30,000 HOME: \$140,000

	Description	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, or acquisition of a vacant lot and new construction of a single-family house for resale to an income eligible first-time homebuyer. Amherst will acquire at least one home or vacant lot in 2020, allocating \$30,000 in CDBG EN funding for acquisition, \$140,000 of 2020 HOME EN funding and supplementing it with the sale proceeds from 391 Grover Cleveland (\$60,000 in HOME Program Income) for the rehab and resale portion of the project. The owner/developer to manage the rehabilitation or new construction of the property may be a CHDO.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	One eligible first time homebuyer household will benefit from the resale of a rehabilitated property. The neighborhood will also benefit from the rehabilitation of the property or in-fill development that occurs.
	Location Description	Town-wide
	Planned Activities	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.
20	Project Name	Amherst HOME Rental Subsidy
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	HOME Construction Rental Subsidy – Special Populations
	Funding	HOME:
	Description	The Amherst HOME Rental Subsidy provides a long-term deferred 0% loan towards the construction of new affordable rental housing development serving LMI seniors, disabled, special populations within the Town of Amherst. For 2020, \$100,000 in prior years PI HOME funds are allocated towards the program.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 new affordable rental units will be created, serving 1 household.
	Location Description	Town-wide
	Planned Activities	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
21	Project Name	Amherst HOME Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	HOME: \$80,000
	Description	Funds for staff and office costs for oversight and implementation of HOME activities: \$80,000. This figure is 10% of the expected total HOME Consortium allocation. The admin. funding will be supplemented with Amherst HOME Program Income; \$10,000 for a total of \$90,000. Increases in 2020 allocation will be applied to the HOME Admin budget line in accordance with percentages allowed.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code: 21H Oversight and administration of the HOME Investment Partnership Grant for the Amherst HOME Consortium.
22	Project Name	Tonawanda Acquisition-Rehabilitation/New Construction-Resale (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Home Ownership
	Needs Addressed	Acquisition Rehab/New Construction Resale
	Funding	HOME: \$100,000

	Description	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, and resale to an income eligible first-time homebuyer. Tonawanda will acquire at least one home in 2020, allocating \$100,000 in 2020 HOME EN funding for the rehab and resale portion of the project. The owner/developer to manage the rehabilitation or new construction of the property may be a CHDO.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 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.
23	Project Name	Tonawanda Residential Rehabilitation (HOME)
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A
	Funding	HOME: \$120,000
	Description	The Town of Tonawanda will allocate \$120,000 of FY2020 HOME EN and approximately \$100,000 of Program Income to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) in the Town-excluding the Village of Kenmore-for necessary repairs to their homes.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately seven income eligible households will be assisted in the Town of Tonawanda.
	Location Description	Town wide

	Planned Activities	HUD Matrix Code 14A Housing Rehabilitation for needed repairs to bring properties up to code and provide safe secure housing.
24	Project Name	Tonawanda First-time Homebuyer Closing Cost Assistance (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Homebuyer Assistance for Affordable Hsg *A
	Funding	HOME: \$20,000
	Description	The Town of Tonawanda will provide closing cost assistance for First Time Homebuyers to purchase a home in that Town. The assistance is in the form of a 0% deferred payment loan provided to potential homebuyers whose income is less than 80% of HUD area median income. \$20,000 in HOME EN funds will be allocated to this Program for PY2020.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately three households will be assisted.
	Location Description	Town-wide
	Planned Activities	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.
25	Project Name	Tonawanda HOME Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	HOME:
	Description	The Town of Tonawanda will use 10% of its HOME program income received in 2020 for admin funding for staff to administer the HOME program in Town.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21H Staff costs for the administration of Tonawanda HOME activities for 2020.
26	Project Name	Cheektowaga Housing Rehabilitation (HOME)
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A
	Funding	HOME: \$120,000
	Description	The Town of Cheektowaga will allocate \$120,000 of FY2020 HOME EN to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) for necessary repairs to their homes.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 low and moderate income homeowners will be assisted.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14A Housing Rehabilitation for needed repairs to bring properties up to code and provide safe secure housing.
27	Project Name	Cheektowaga CHDO Acquisition-Rehabilitation/Acquisition-New Construction/Resale (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Acquisition Rehabilitation Resale *A
	Funding	HOME: \$120,000

	Description	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 \$120,000 HOME EN funding and \$90,000 in HOME PI funding.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 low-moderate income family or individual will benefit from the creation or rehab of the single-family home.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14G The Town is prepared to acquire and rehabilitate a vacant, deteriorated property for resale as an affordable unit to an eligible first time homebuyer using HOME entitlement funds. This activity will be completed in conjunction with a CHDO developer.
28	Project Name	Cheektowaga First-time Homebuyer Program (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Homebuyer Assistance for Affordable Hsg *A
	Funding	:
	Description	Closing cost assistance to income eligible first-time homebuyers. The loan is a 0% deferred loan to cover the closing costs. Previous years' funding to be used.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately four households will be assisted.
	Location Description	Town-wide
	Planned Activities	Matrix Code 13 Direct Homeownership assistance to LMI households.
29	Project Name	Cheektowaga HOME Administration
	Target Area	Town Wide

	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	:
	Description	The Town of Cheektowaga will use 10% of its HOME program income received in 2020 for admin funding for staff to administer the HOME program.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21H Costs associated with administration and delivery of HOME funded activities. 10% of Cheektowaga's HOME program income will be used for this activity.
30	Project Name	Cheektowaga HOME Rental Subsidy
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	HOME Construction Rental Subsidy – Special Populations
	Funding	HOME:
	Description	The Cheektowaga 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. For 2020, \$400,000 in prior years PI HOME funds are allocated towards the program.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4-6 Units of Affordable Rental housing new construction or renovation will be created, serving 4-6 households.
	Location Description	Town-wide

	Planned Activities	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
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Table 92 – Project Summary Information

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

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

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

Geographic Distribution

Target Area	Percentage of Funds
Opportunity Zone	20
Egbertsville	50
Town Wide	30

Table 93 - 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, façade improvements, 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 degradation 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

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 relies 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.

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

Table 94 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	2
Rehab of Existing Units	60
Acquisition of Existing Units	2
Total	74

Table 95 - One Year Goals for Affordable Housing by Support Type

Discussion

Amherst

The Town will be acquiring a vacant property on Grover Cleveland Highway for rehabilitation of a single-family home and resale to a low-mod household. In 2020 the town will also acquire a vacant parcel on Sunset Court to construct a three-bedroom home to sell 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 majority of Cheektowaga's CDBG funds are focused on residential rehabilitation on income-eligible existing owner-occupied units through a 0%-1.5% deferred and payback loan program along with housing counseling services. Additionally, the use of HOME funds involves some residential rehab of existing owner-occupied units, but the majority is utilized for the acquisition/rehab/new construction of affordable housing units. The Town has collaborated with the Buffalo Erie Niagara Land Improvement Corp. (BENLIC) to acquire vacant lots at the Erie County Tax foreclosure auctions. BENLIC is currently holding several lots for the Town for the construction of new affordable homes. In 2020 the Town will acquire the lot at 89 Gardenvale Drive or 39 Peachrow Lane for the construction of a new three-bedroom, single family home and sale to an income eligible first-time homebuyer. The following year the Town will acquire the second lot and again construct another new three-bedroom, single family home and sale to an income eligible first-time homebuyer. These two projects shall be accomplished with program income from the sale of current acquisition/rehab and new construction/resale projects that are in the completion phase and ACT Consortium set-aside HOME funds. The program will also assist approximately three first-time income eligible homebuyers with closing cost assistance in the form of a 0% deferred loan.

Tonawanda

At this time Tonawanda's HOME funds are only utilized for a first-time homebuyer program and a residential rehab program for existing owner-occupied units. In 2020, Tonawanda also intends to use HOME funds to rehabilitate a home which is to be acquired by the Town via other funding sources. The home will then be sold to a low- to moderate-income first-time homebuyer. Due to the severe need for decent, affordable rental units, Tonawanda is willing to entertain the idea of subsidizing the creation of affordable rental units (likely as part of a school or public facility conversion project) using HOME funds should the opportunity present itself. 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 Rapid Rehousing 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

Amherst awarded Belmont Housing Resources of WNY a HOME Rental Subsidy (\$300,000) towards their affordable senior rental housing development proposed for Alberta Drive in Amherst. The project will begin construction in January 2020 and provide 46 new affordable rental units for seniors or disabled adults. Amherst will continue to work with Belmont and other non-profit housing providers to develop additional affordable housing opportunities in the future with HOME funding incentives, as adequate resource becomes available.

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. Two separate developers have approached the Town for the development of an 89 unit and 66-unit tenant based affordable senior housing rental complexes using existing structures. Home funds will be utilized towards both projects which are also contingent on New York State HCR tax credit funding.

The Kenmore Public Housing Authority is going to continue to maintain its existing facilities. No additional units are planned in 2020.

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. Completed Acquisition-Rehab/New Construction-Resale homes available for sale are also directly advertised to public housing residents. Public Housing residents may be able to qualify for a mortgage for these homes if they receive a Section 8 Voucher, which can be applied towards a share of the mortgage payment each month.

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 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.

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 2020 Action Plan goals do address assisting frail elderly and those at-risk of homelessness.

Hearts for the Homeless emergency shelter will continue to operate their mobile shelter. 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 Y 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 agency.

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 and transportation.

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.

The Erie County Fair Housing Partnership provides a forum to identify and discuss solutions to current fair housing issues. This organization deals with sub-prime lending activities which may be legal, but which often set up low- and moderate-income homeowners to become overburdened with debt and

lose their homes to foreclosure. They also offer counseling and legal assistance to homeowners facing foreclosure. 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 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

Chronic Homelessness

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 10th annual Project Homeless Connect Buffalo was held in October 2019 at the Buffalo Niagara Convention Center. More than 70 human service agencies throughout the area offered assistance in finding jobs, a place to live, health care and fulfilling other needs for those who are homeless or at risk of homelessness. Free shuttle buses were available to bring people in from local soup kitchens and shelters.

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-three (63) 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. The town is aging as well. To address these changes, the Town is reimagining itself in a project called Imagine Amherst. Imagine Amherst has been working with residents and technical committee over the past four years to revise guiding language in the comprehensive plan to address commercial development's form and mixture of uses in older commercial clusters in town. The changes to the comprehensive plan were recently adopted in December 2017. In 2019, the Town adopted changes to its zoning code to implement Imagine Amherst for the Opportunity Zone section of Town (Census Tract 92).

In 2020, Amherst will be looking to implement this new vision for the town's commercial development through zoning amendments beyond the Opportunity Zone and into the rest of the Town, as well as in office-space zoning districts areas. The intent is to convert underutilized office buildings into mixed use to provide for additional opportunities for in-fill housing and more vibrant neighborhoods. How those zoning amendments take shape will affect affordable housing stock in town and the reinvestment of many of Amherst's affordable neighborhoods in the near future. Amherst's Community Development staff will be involved with the project to ensure affordability is a component of these zoning changes and to align with any funding priorities necessary to support affordable housing in 2020 and beyond.

Aside from the Imagine Amherst project, staff is also looking at other codes and regulations that impact affordable housing. In 2020, a further review of zoning code and other town policies will take place and recommendations will be developed.

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 35 single-family units and two two-family unit will be rehabilitated. (Town/Village-wide)

Through the Consortium's partnership with New Opportunities Community Housing Development Corp. Amherst will acquire and rehabilitate or build at least one home in the Town to be resold to first-time homebuyers. 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 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 2020 Conference and other activities scheduled for April, Fair Housing Month. The Town of Amherst also has a very active Committee on Disabilities that has addressed ADA compliance in all Town facilities and will be directing its efforts, along with Town departments, to establishing a Town Policy on ADA compliance and accessibility throughout the Town. Fair Housing counselors are noting an increased rate of discrimination reports from persons with disabilities that are trying to find housing in the Town. 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 Section8/Section 202 New Construction Program if funding becomes available.

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 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 on-going 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.

Within the Town of Amherst, the Amherst Industrial Development Agency (AIDA) has assisted businesses to grow, expand and provide new jobs to lower income area residents by providing working capital loans from a revolving loan fund established with prior years' CDBG funds. The AIDA has recently begun working with the Town on the development of a Façade Improvement Program. The program will assist business owners with rehabilitation of facades through a grant/loan combo, in return for job creation or business services to a LMI neighborhood. Amherst IDA will administer the program for the Town.

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 requirement. Section 3 provides for preference to be given to a contractor who meets requirements for Section 3 certification by agreeing to hire low-income Town residents for that project. The Town requires contractors working on projects funded with CDBG and HOME funds to post any job opening in the rental offices of low-income family housing developments.

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 Amherst and Cheektowaga.

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 \$174,800. The methodology applied included collecting sales data from each Town Assessor for the months of June and July 2019 for single-family homes (Code 210) with arms-length sales. The number of sales were 286 in June and 353 in July; resulting in the need for only two months of sales data for the analysis. The median sale value of the data set is \$184,000, that figure multiplied by 95% generates the value limit of \$174,800. 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 2020.

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

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

Introduction

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	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	50,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	79.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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	T
	first-time homebuyers assisted	20	20	10
2020 goal:	low-mod homebuyers assisted	4	4	2

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

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:"

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

$$\text{HOME investment} + \text{HOMEBUYER investment}$$

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

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.

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.

Amherst DRAFT 2020 Community Development Block Grant - HOME Program Budget

2020 CDBG Allocation		
Town of Amherst & Village of Williamsville	\$	550,000

Stabilization and Rehabilitation of the Historic Village Section House	\$	28,500
Glenn Park Nature Center Roof Rehab/Conversion	\$	10,000
Village of Williamsville (7% Portion per Cooperation Agreement)	\$	38,500

Town of Amherst Portion \$ 521,500

Rehab	CD Payroll
\$ 102,300	\$130,000

HOUSING ACTIVITIES Expected CDPI
\$150,000**

CDBG Homeowner Rehab (Includes 3/4 Bldg. Insp. & 9/10 Clerk Typist)*	\$	232,300	\$	122,000
Acquisition-Rehab-Resale	\$	30,000		
Lead Testing, Risk Assessments, Clearance Testing	\$	8,000		
Weatherization Services	\$	14,000		
Total Housing Activities	\$	284,300	\$	122,000

PUBLIC SERVICES

Community Policing	\$	8,000		
Family Justice Center Signage and Outreach	\$	3,000		
Boys and Girls Club (Egbertsville After School)	\$	37,000		
Housing Assistance Counseling Services (Belmont Shelter Corp.)	\$	16,500		
B.U.L.Foreclosure Prevention Counseling	\$	8,000		
YWCA, Inc.	\$	25,000		
Total Public Services	\$	97,500		

PUBLIC FACILITES

Sidewalk ADA Ramps	\$	20,000	\$	-
Total Façade Program	\$	20,000	\$	-

ADMINISTRATION / PLANNING

Admin. Staff and Fringe Benefits	\$	96,500	\$	28,000
Office Expenses	\$	1,200		
Public Information (advertising)	\$	2,000		
Fair Housing Counseling-HOME	\$	10,000		
Total Administration/Planning	\$	109,700	\$	28,000

Activities Total

CDBG Allocation	\$	550,000	2020 PI Anticipated	
2019 Program Income	\$	173,313	\$	150,000
Total CDBG	\$	723,313		

2020 HOME Allocation			Est. PI**
Amherst - Cheektowaga - Tonawanda HOME Consortium	\$	800,000	\$ 300,000

Consortium Expenses			3 Town
3 Town Administration/Program Delivery (10% of total)	\$	80,000	
Remaining portion to be split by the 3 Towns	\$	720,000	

Town of Amherst Portion of Remainder of HOME Grant	\$	240,000	\$	100,000
Program Income Admin Portion			\$	10,000

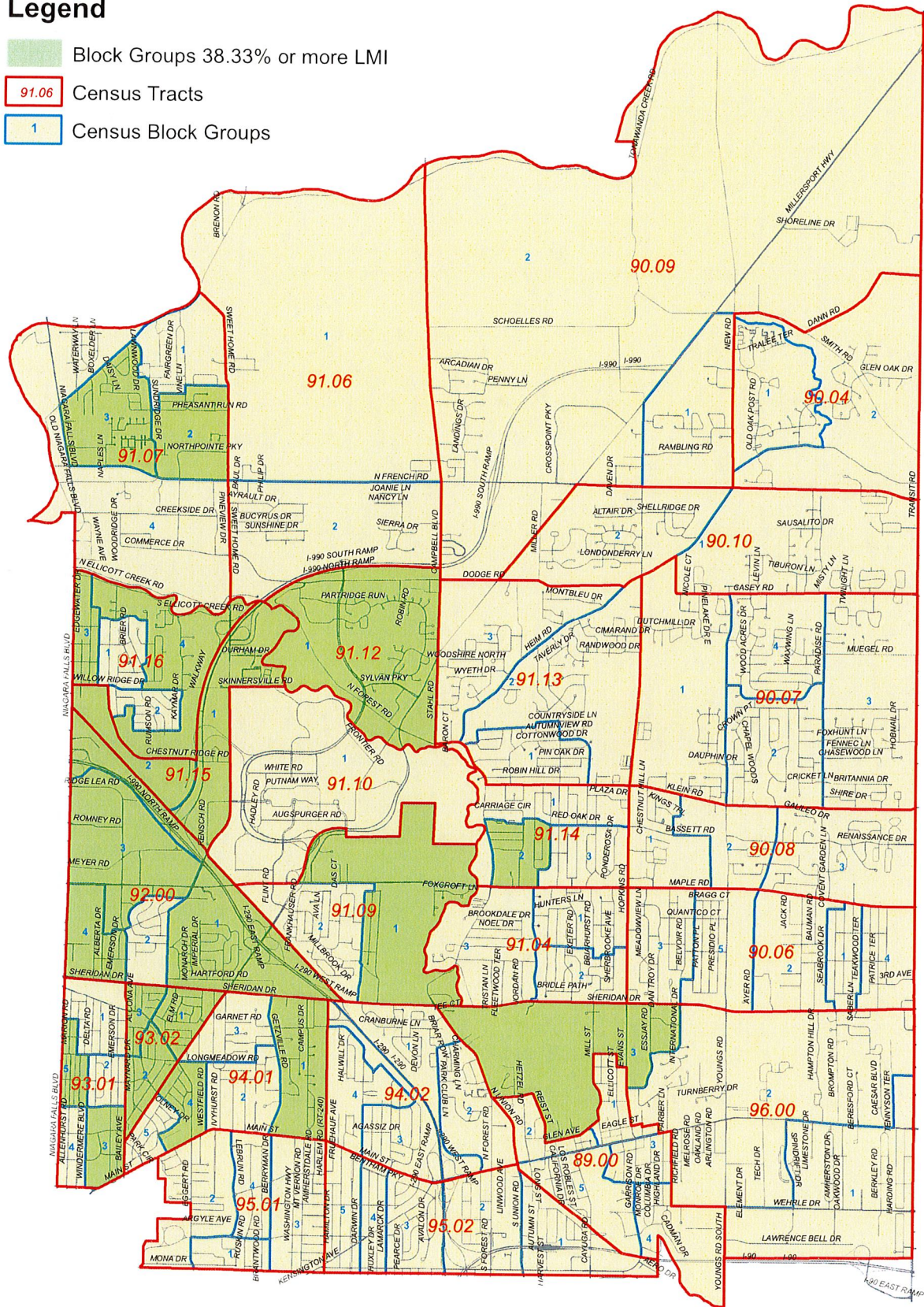
Town of Amherst Projects

Housing Rehabilitation Loans	\$	100,000	\$	30,000
Acquisition/Rehabilitation or New Construction/Resale	\$	140,000	\$	60,000
HOME Rental Subsidy	\$	-		
First-Time Homebuyer Assistance	\$	-		
	\$	240,000	\$	100,000

**Denotes funding from the estimated program income receipts.

Legend

- Block Groups 38.33% or more LMI
- 91.06 Census Tracts
- 1 Census Block Groups



Town of Amherst

Low/Moderate Income Block Groups
 HUD Data Release April 2019



