

## 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 Solution 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 2015 through FY 2019 (April 1, 2015 to March 31, 2020).

#### ***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, 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, the Towns have updated or supplemented the HUD-provided tables 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

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 police patrols 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 2015 Annual Plan includes the following activities: housing rehabilitation, public services, public facilities, homebuyer assistance, code enforcement, housing counseling, public improvements, and historic preservation. 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 FY2014 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed.

During the 2013 program year, April 1, 2013 through March 31, 2014, the Town of Amherst provided \$558,359 in housing rehabilitation loans to eligible owners of fifty-two (52) single family homes. This sum includes \$310,377 in CDBG funds, \$112,704 in HOME funds, and \$135,278 in NYS Affordable Housing Corp. funds expended during this period. Lead paint hazards were removed from fourteen (14) homes in Amherst. In addition to housing rehabilitation loans, HOME funds are used to purchase foreclosed, vacant and deteriorated residential property in Amherst for rehabilitation and resale to an income eligible first-time homebuyer. This activity is accomplished in conjunction with the Town's CHODO, New Opportunities Community Housing Development Corp. There were no Amherst properties acquired in 2013. HOME funds were also used to assist six (6) individual first-time homebuyers in purchasing homes in Amherst during the 2013 program year.

CDBG funds supported the following services:

- Family Service Counseling through Catholic Charities
- Boys and Girls Club after school services
- Housing Counseling and Financial Education services
- Fair Housing activities
- Foreclosure Prevention Counseling.
- The Amherst Senior Center through the purchase of a new wheelchair accessible van for our senior residents with disabilities
- CDBG Community Policing program through the Town's Police Department providing additional bicycle and foot patrols in target neighborhoods
- Dedicated Code Enforcement program throughout the target areas of the Town benefiting residents of Eggertsville and Creek Woods neighborhoods.

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 Village Mill located on Spring Street and purchased by the Village to forestall foreclosure of the Mill property. This activity has been ongoing and was projected to be completed in the Spring of 2014, but the completion time is now expected for the Spring of 2015. This Village activity is leveraging a State Historic Preservation grant to supplement the cost of the restoration. The Village has completed the installation of the paved pathway through and around the South Long Street Park behind the Village Square Senior Apartments in

the Village to provide mobility and accessibility to the park for all residents.

#### **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. This participation by low- and moderate-income persons, particularly those living in designated target areas and in areas where Community Development Block Grant funds are proposed to be used, and by 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.

Each town in the ACT Consortium 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.

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 and the Metro as a display advertisement at least 30 days prior to its submission to the 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 and the Town Clerks' offices and on the Towns' websites. The summary will describe the contents and purpose of the Consolidated and Annual Plans, and will include a list of the locations where copies of the entire proposed Plans may be examined. In addition, the Towns provide a copy of the plan to citizen groups that request it and copies on disk to individuals.

Notice of a public hearing to be held during the development of the Annual and Consolidated Plan to invite public comments and inquiries will be placed in the legal sections of the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE and the Metro Source at least 10 days prior to the date of the hearing and as a display ad in these papers. Public hearings in the Town of Amherst are conducted as part of regularly scheduled meetings and thus have a "captive

audience" with a broader reach than would be experienced at separate meetings for the Annual Plan alone. These meetings are also broadcast on local public access television.

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 is requesting citizen comments and the final deadline for the public comments for the 2014 Annual Plan is January 17, 2014 and are required to be submitted in writing to Amherst Community Development, 5583 Main Street, Williamsville, NY 14221.

**The 2015 Action Plan is based upon Final HUD 2015 allocations for funding and the 3.0% decrease in the actual funding will be absorbed by the Housing Rehabilitation Programs. Any larger increase or decrease would have resulted in an across the board corresponding % of increase or decrease in all discretionary CDBG and HOME proposed 2015 projects and public notification of any changes.**

**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 above.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 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 Strategic 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. The Town'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:

Town of Amherst

5583 Main Street

Williamsville, NY, 14221

## **PR-10 Consultation - 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

**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(I)).**

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. Amherst coordinates with the Homeless Alliance of Western New York, which 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.

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 to end homelessness in the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless and permanent housing for clients dealing with mental health and/or substance abuse 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. Focus group meetings were held September 9th to 11th and October 22nd to 24th with affordable/special needs housing and service providers, business associations, homeless service agencies, community building organizations, economic development officials, neighborhood groups, health and human service providers, and other stakeholders. In addition, two advertised public hearings took place on October 20, 2014 and January 20, 2015.

**Table 2 – Agencies, groups, organizations who participated**

**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. Because Amherst does not have any public housing within the Town, PHAs were not consulted during this process.

**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?
2014 ACT Consortium Annual Action Plan	ACT Consortium	Goals of the Strategic Plan relate to previous years' efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2014 ACT Consortium Consolidated Annual Performance Evaluation Report	ACT Consortium	Goals of the Strategic Plan relate to previous years' efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2009 Analysis of Impediments	ACT Consortium, Erie County Consortium	The current goals and strategies to overcome current barriers to fair housing are drawn from this plan
2011 Erie County Comprehensive Economic Development Strategy	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
One Region Forward	University at Buffalo Regional Institute	Economic development strategies are designed to align with and complement the <i>One Region Forward</i> regional plan
2013 Program Needs Analysis	Erie Community College	The findings and recommendations of this plan support the goals of decreasing the skills gap in the local labor market within the Strategic Plan's economic development plans
2011 Town of Amherst Comprehensive Plan	Town of Amherst	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Amherst

**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 (optional):**

## **PR-15 Citizen Participation**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation**

#### **Summarize citizen participation process and how it impacted goal-setting**

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 CP.

The Town continues to interact with the various public and non-profit institutions that provide housing and supportive services to low income residents. Although the agencies are independent of one another, they work together to ensure that their programs and services are coordinated and that residents are served.

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. As such, the Town, through the ACT HOME Consortium, has laid out a Citizen Participation Plan (CPP) to broaden citizen participation. This CPP can be found in Appendix \_\_\_\_.

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.

The Citizen Participation Plan provides for and encourages public participation and consultation, emphasizing involvement by citizens and the organizations and agencies that serve low/moderate-income person through the use of HUD federal grants and other public and private sector funds.

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public hearing	All community residents	<i>To be completed in final draft</i>	<i>To be completed in final draft</i>	<i>To be completed in final draft</i>	N/A
2	Public hearing	All community residents	<i>To be completed in final draft</i>	<i>To be completed in final draft</i>	<i>To be completed in final draft</i>	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 and owners, as well as households with special needs. Additionally, needs were identified through a comprehensive public outreach process that included stakeholder consultation, 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 2007-2011 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 was drawn from the 2007-2011 ACS and other sources to provide additional context when needed.

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

### **Summary of Housing Needs**

High housing costs reduce economic opportunities and access to prosperity, especially among lower-income racial and ethnic minorities in the ACT HOME Consortium. Renters are much more likely than homeowners to experience housing problems, among which cost burden is by far the most prevalent. Severely cost burdened renter households earning 0-30% of the HUD Area Median Family Income (HAMFI) have the greatest housing need, representing nearly 30% of renter households that reported a housing problem and 14% of all households that reported a problem. In 2011, the latest year for which data in this section was available, the HAMFI for Erie County was \$65,258. Therefore, the 0-30% category includes households earning \$19,577 or less per year.

Cost burden is a problem shared by both owner and renter households. In the Consortium, 8,980 owner households and 6,285 renter households experiencing this problem. While cost burden and severe cost burden are most likely for very low income households earning below 30% of HAMFI, moderately low income owner households earning between 50% and 80% of HAMFI are the largest cost-burdened group.

Households in the Consortium are more heavily represented at the high end of the income spectrum, with over 55% of households earning more than the HAMFI. Larger families are more likely than smaller families to have lower incomes, with one in five small families earning less than 80% HAMFI compared to one in four large families.

Households with at least one person age 75 or older and households with children below age 6 are also less likely to earn above the median income than all other household types. Almost 75% of households with a member older than 75 and over 60% of households with children under 6 earned less than the HAMFI.

With regard to other housing problems, single-family households represent 85% of crowded households. However, crowding is very rare for both homeowner and renter households.

### **Housing Needs:**

In CHAS data, housing problems are broken down into four categories: cost burden, lack of complete plumbing or kitchen facilities, overcrowding, and zero/negative income (meaning the household reported an annual income at or below zero). Per a 2007 HUD "Worst Case Needs Report," households with zero or negative incomes are not considered to be cost-burdened. Cost burden and overcrowding are further subdivided into standard and "severe" problems.

The following points summarize the tables found on the following pages:



## **Housing Problems by Tenure**

- Renter households are much more likely to experience housing problems. Although there are far more owner households than renter households, there are about the same number of households experiencing at least one housing problem amongst both owners and renters.
- Amongst renters, households experiencing housing problems are more likely to be on the lower end of the income spectrum, while housing problems are somewhat more evenly distributed across income tiers for owners.

## **Cost Burden**

- Of cost burdened households, renters earning below 30% of HAMFI and owners earning between 50% and 80% of HAMFI are the largest cost burdened groups. Renters earning below 30% of HAMFI are also the most likely to be severely cost burdened by a large margin.
- A similar number of renter and owner households are cost burdened. Renter households represent 55% of severely cost-burdened households.
- Small related, large related, and elderly households with very low incomes (below 30% of HAMFI) all experience cost burden at around the same rates, between 35% and 39%. As household income increases, however, small related families are more likely to be cost burdened than large families and elderly households. Elderly households are the least likely.
- Most very low income small and large families that are cost-burdened are severely cost-burdened. Elderly households are less likely to be severely cost burdened.

## **Crowding**

- Crowding is not a large concern in the Consortium with only 1.5% of all households living in crowded housing. Risk for overcrowding varies by income: renters earning between 0 and 30% of HAMFI are most likely to experience overcrowding, while among homeowners, those earning between 30 and 50% and 80% to 100% of HAMFI are most at risk.
- Single-family households are by far the most likely to experience overcrowding among both renters and owners.

## Demographic Data

Demographic indicators are essential to understanding a community's housing needs. The data provides a snapshot of the Consortium's growth and highlights the ongoing increase in population and households.

The following tables are HUD-generated tables within the IDIS eCon Planning Suite using 2007-2011 CHAS data. HAMFI refers to "HUD Area Median Family Income," which is the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs.

Demographics	Base Year: 2000	Most Recent Year: 2010	% Change
Population	288,684	283,931	-2%
Households	118,378	119,048	1%
Median Income	\$0.00	\$0.00	

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

\* A median income across all three jurisdictions was not available. The ACS 2012 Five-Year medians for Amherst, Cheektowaga and Tonawanda were \$68,018, \$47,360 and \$52,288, respectively, compared to \$55,427, \$38,121 and \$41,453 in 2000, representing raw change of 22.7%, 24.2% and 26.1%. After adjusting for inflation, the real median income for Amherst *declined* by 7.9%, for Cheektowaga by 6.8% and for Tonawanda by 5.4% between 2000 and 2012.

## Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	20,215	13,535	40,350	25,450	126,470
Small Family Households *	4,400	5,130	10,160	8,370	67,290
Large Family Households *	460	730	2,460	1,350	8,860
Household contains at least one person 62-74 years of age	2,938	4,430	7,630	5,610	21,990
Household contains at least one person age 75 or older	4,860	10,460	12,200	4,220	11,250
Households with one or more children 6 years old or younger *	2,056	2,420	4,170	2,680	6,866
* the highest income category for these family types is >80% HAMFI					

**Table 6 - Total Households Table**

**Alternate Data Source Name:**

Maplebrook Survey Data

**Data Source Comments:**

## 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
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	160	150	285	40	635	35	0	50	35	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	30	4	15	0	49	0	35	0	0	35
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	75	15	50	30	170	0	49	45	90	184
Housing cost burden greater than 50% of income (and none of the above problems)	4,290	1,890	210	25	6,415	2,145	2,055	1,400	325	5,925
Housing cost burden greater than 30% of income (and none of the above problems)	685	2,180	2,880	540	6,285	530	2,415	3,930	2,105	8,980

	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
Zero/negative Income (and none of the above problems)	1,030	0	0	0	1,030	300	0	0	0	300

**Table 7 – Housing Problems Table**

Data 2006-2010 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
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	4,560	2,055	555	100	7,270	2,185	2,135	1,505	450	6,275
Having none of four housing problems	1,455	3,415	6,565	3,585	15,020	695	4,930	11,735	8,585	25,945
Household has negative income, but none of the other housing problems	1,030	0	0	0	1,030	300	0	0	0	300

**Table 8 – Housing Problems 2**

Data 2006-2010 CHAS

Source:

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
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	1,280	1,225	775	3,280	385	950	1,959	3,294

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	103	80	130	313	60	139	640	839
Elderly	1,290	1,460	1,160	3,910	1,715	2,810	1,720	6,245
Other	2,450	1,454	1,230	5,134	550	619	1,059	2,228
Total need by income	5,123	4,219	3,295	12,637	2,710	4,518	5,378	12,606

**Table 9 – Cost Burden > 30%**

Data 2006-2010 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
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	1,120	480	75	1,675	365	655	469	1,489
Large Related	99	15	0	114	60	69	90	219
Elderly	870	965	150	1,985	1,255	965	490	2,710
Other	2,335	559	110	3,004	490	350	349	1,189
Total need by income	4,424	2,019	335	6,778	2,170	2,039	1,398	5,607

**Table 10 – Cost Burden > 50%**

Data 2006-2010 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
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	95	19	65	30	209	0	49	25	90	164
Multiple, unrelated family households	15	0	0	0	15	0	35	20	0	55
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	110	19	65	30	224	0	84	45	90	219

**Table 11 – Crowding Information – 1/2**

Data 2006-2010 CHAS  
 Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
 Comments:

Housing Problems in the ACT HOME Consortium						
	Town of Amherst		Town of Cheektowaga		Town of Tonawanda	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
<b>Substandard Housing</b>						
Occupied Housing Units	48,568		38,456		32,290	
Lacking complete plumbing facilities	100	0.20%	117	0.30%	36	0.10%
Lacking complete kitchen facilities	556	1.10%	239	0.60%	247	0.80%
No telephone service available	530	1.10%	811	2.10%	553	1.70%
<b>Occupants per Room</b>						
1.00 or Less	48,253	99.40%	38,252	99.50%	32,167	99.60%
1.01 to 1.50 (Overcrowded)	182	0.40%	120	0.30%	68	0.20%
1.51 or more (Severely Overcrowded)	133	0.30%	84	0.20%	55	0.20%
Source: ACS 2012						

Cost Burden in the ACT HOME Consortium						
	Town of Amherst		Town of Cheektowaga		Town of Tonawanda	
	Estimate	Percent	Estimate	Percent	Estimate	Percent
<b>Gross Rent as a Percentage of Household Income (GRAPI)</b>						
Occupied units paying rent (excluding units where GRAPI cannot be computed)	12,798	12,798	10,397	10,397	8,624	8,624
Less than 15.0 percent	1,687	13.20%	1,564	15.00%	1,511	17.50%
15.0 to 19.9 percent	1,653	12.90%	1,339	12.90%	1,194	13.80%
20.0 to 24.9 percent	1,393	10.90%	1,664	16.00%	1,479	17.10%
25.0 to 29.9 percent	1,515	11.80%	1,112	10.70%	1,010	11.70%
30.0 to 34.9 percent	1,021	8.00%	805	7.70%	972	11.30%
35.0 percent or more	5,529	43.20%	3,913	37.60%	2,458	28.50%
<b>Selected Monthly Owner Costs as a Percentage of Monthly Income (SMOCAPI)</b>						
Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)	22,995	22,995	16,184	16,184	14,709	14,709
Less than 20.0 percent	10,379	45.10%	7,061	43.60%	6,918	47.00%
20.0 to 24.9 percent	4,350	18.90%	2,646	16.30%	2,348	16.00%
25.0 to 29.9 percent	2,743	11.90%	1,568	9.70%	1,758	12.00%
30.0 to 34.9 percent	1,620	7.00%	1,496	9.20%	1,027	7.00%
35.0 percent or more	3,903	17.00%	3,413	21.10%	2,658	18.10%
Source: ACS 2012						

It should be noted that some of the housing problems indicated in the tables above (e.g., overcrowding) may be due to college students living in residential areas near the SUNY Buffalo North campus.

Data on other housing problems not noted by CHAS data or the ACS data (such as problems with roofing, windows, doors, foundations, and other housing issues) is not available. However, community development staff in the ACT Consortium towns noted that these factors are

significant housing problems in the area, particularly given the large proportion of older housing stock. Stakeholders expressed the viewpoint that low-income residents in the Consortium disproportionately lived in older housing stock and housing stock with deteriorated conditions. These housing conditions and community needs are addressed through the Consortium's housing rehabilitation programs even though the deterioration of housing in the Consortium is not fully captured in the IDIS data.

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

According to the 2010 Census, 40,110 householders in the ACT HOME Consortium were living alone; this is approximately 33% of all households in the Consortium. ACS data from 2010 describes single person households in the Consortium: 25,107 (63%) are women, 17,596 (44%) are residents over age 65, 16,749 (42%) are renters, 21,294 (53%) are not in the workforce, and 6,775 (17%) have no vehicle available.

Compared to the general population, members of single person households in the Consortium are more likely to be female, over 65, renters, not in the workforce, and without access to a vehicle. Just under one-half (47%) of households with at least one person over 65 are single person households, while single person households make up only one-quarter of households without members over 65. Single person households make up 27% of owner-occupant households, but over half (52%) of renter households. While just under one-third (31%) of all households in the Consortium had no household members in the workforce, over half of all residents in single person households (55%) were not in the workforce. Eight percent of all households have no vehicle available, but 17% of one-person households lack access to a vehicle.

Stakeholder interviews identified transportation between housing and jobs as a large issue in the Consortium. Other stakeholders also identified senior housing as a need in the area. Seniors in the area want to age in place, but at the same time, smaller accessible units may be a need. As it stands, stakeholders say that the area has largely been unsuccessful in attracting tax-credits for elderly housing projects.

The table below - 1. Single Person Household Housing Problems - provides a rough estimate of the number of single person households in need of housing assistance by applying the general population ratio to the data in the Housing Problems Table. Specific data on this sub-population relative to the needs listed in these tables is not available. However, based on the above information, we can safely assume that the following table underestimates the number of single person households in need of housing assistance.

The largest problem facing single person households in the Consortium is housing cost, as seen in the Housing Problems and Housing Problems 2 tables in NA-10.





## 1. Single Person Household Housing Problems

	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	53	50	94	13	210	12	0	17	12	40
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	1	5	0	16	0	12	0	0	12
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	25	5	17	10	56	0	16	15	30	61
Housing cost burden greater than 50% of income (and none of the above problems)	1,416	624	69	8	2,117	708	678	462	107	1,955
Housing cost burden greater than 30% of income (and none of the above problems)	226	719	950	178	2,074	175	797	1,297	695	2,963
Zero/negative Income (and none of the above problems)	340	0	0	0	340	99	0	0	0	99

Data Source: 2006-2010 CHAS; further calculations by Mullin and Lonergan Associates

**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 2010, 31,848 individuals in the Consortium, or 11.5% of the population, reported a disability. Around half of these individuals were over the age of 65, comprising over 30% of the senior population. Senior housing, therefore, should accommodate a large proportion of individuals with disabilities.

People under 65 with disabilities are much more likely to have incomes under the poverty level than disabled persons over 65. Although only 5.5% of the population between the ages of 5 and 17 reported at least one disability, one in five of these children (22%) lived in families with incomes under the poverty level. For people ages 18 to 65, just under one in five (18%) people lived in poverty. In contrast, fewer than one in 10 seniors with a disability lived in poverty. When planning for families with disabilities, a greater proportion of this housing needs to be affordable to low-income households.

No data was available on victims of domestic violence, dating violence, sexual assault, and stalking in the Consortium. However, all of these crimes could impact victims' need for housing. Confidential emergency re-housing is generally a common need among this population.

**What are the most common housing problems?**

As shown, the most common housing problem in ACT HOME Consortium is cost burden. There are 6,285 renter-occupied households and 8,980 owner-occupied households with housing costs greater than 30% of their income, particularly in the 30%-50% and 50%-80% of HAMFI categories. Renter-occupied households with housing costs greater than 50% (severely cost burdened) in the 0-30% AMI category is the single largest category of housing problem.

In addition to cost burden, 339 owner households and 854 renter households experience at least one type of housing problem, including overcrowding, lack of kitchen facilities and/or lack of bathroom facilities, though there may be some overlap across these categories. Lack of complete kitchen or plumbing facilities is the most common physical housing problem for renters. Overcrowding is the most common for owners. For both owners and renters, physical housing problems are most common among households in the 50%-80% of HAMFI category.

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.

**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 5,134 “other” renter households paying more than 30% of income housing costs, accounting for 41% of all cost-burdened households. There are 3,004 “other” households paying more than 50%, representing 45% of severely cost-burdened households. Elderly owner households make up about half of all cost burdened and severely cost burdened households.

**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**

As previously noted, the lack of affordable housing makes it difficult for low-income individuals and families with children to maintain a stable household. High housing costs, physical deficiencies, unstable neighborhoods, and overcrowding all contribute to local homelessness problems.

Erie County stakeholders report that funding for homelessness services has been cut by more than half over the last several years, which has exacerbated the risk for homelessness in the area. Stakeholders report a great need for emergency housing for 18-24 year olds and the elderly. Among the elderly, social service providers are seeing more homeless clients with physical challenges who require accessible accommodations. Another challenge is getting

homeless residents into more permanent housing: stakeholder interviews reported that area landlords are hesitant to rent to residents who have recently been homeless.

## **NA-15 Disproportionately Greater Need: Housing Problems – 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**

HUD defines a disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate at least 10 percentage points greater than that of the 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 tables below report AMI, they refer to HAMFI. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e. cost burden)

According to the 2006-2010 ACS, the total population of Pacific Islanders in the Consortium is 47 people (0.02% of the total population) and the total population of American Indian and Alaska Natives is 613 people (0.22% of the total population). Given the low share of these populations, the estimates from the ACS and CHAS datasets have relatively large margins of error. As such, these populations are not included in the analysis.

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. Black households are more likely than White households to experience housing problems in every income category. Hispanic and Asian households are more likely to experience housing problems than White households in two of four income categories. According to the above definitions, five racial/ethnic groups in the Consortium experience severe housing problems at a disproportionate level:

- Black households earning 30-50% AMI
- Black households earning 50-80% AMI
- Asian households earning 50-80% AMI
- Hispanic households earning 30-50% AMI
- Hispanic households earning 50-80% AMI

Racial/ Ethnic Group	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
% with one or more housing problems*				
Jurisdiction as a Whole	90.3%	69.2%	40.2%	19.6%
White	89.8%	68.1%	38.7%	20.2%
Black/ African American	96.1%	<b>88.0%</b>	<b>63.1%</b>	<b>14.1%</b>
Asian	95.7%	<b>0.0%</b>	<b>63.4%</b>	19.4%
Hispanic	82.0%	<b>92.6%</b>	<b>51.9%</b>	0.0%

*\*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%*

It should be noted, however, that non-White groups have very small sample sizes and data on these groups are therefore more prone to error. In each income level, White households represent 82%-94% of the jurisdiction as a whole, significantly influencing the overall trend.

#### 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	9,525	1,020	1,120
White	7,860	890	740
Black / African American	980	40	45
Asian	449	20	318
American Indian, Alaska Native	0	10	15
Pacific Islander	0	0	0
Hispanic	205	45	0

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2006-2010 CHAS

\*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	9,325	4,155	0
White	8,600	4,020	0
Black / African American	405	55	0
Asian	165	65	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	125	10	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2006-2010 CHAS

\*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	8,375	12,470	0
White	7,325	11,625	0
Black / African American	495	290	0
Asian	310	179	0
American Indian, Alaska Native	0	65	0
Pacific Islander	0	15	0
Hispanic	200	185	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2006-2010 CHAS

\*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**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,525	10,380	0
White	2,395	9,455	0
Black / African American	65	395	0
Asian	54	225	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	155	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2006-2010 CHAS

\*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%



## **NA-20 Disproportionately Greater Need: Severe Housing Problems – 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**

HUD defines a disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate at least 10 percentage points greater than that of the 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 following HUD tables report AMI, they refer to HAMFI.

Severe 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 income (i.e. severe cost burden)

According to the 2006-2010 ACS, the total population of Pacific Islanders in the Consortium is 47 people (0.02% of the total population) and the total population of American Indian and Alaska Natives is 613 people (0.22% of the total population). Given the low share of these populations, the estimates from the ACS and CHAS datasets have relatively large margins of error. As such, these populations are not included in the analysis.

In general, the percentage of households with a severe housing problem is high for the lowest income bracket (0-30% AMI) and decreases as income increases. Black households experience severe housing problems at a higher rate than White households at every income level except for 80-100% AMI. Asian and Hispanic households experience severe housing problems at higher rates than White households in two of four income categories. According to the above definitions, only one racial/ethnic group in the Consortium experiences severe housing problems at a disproportionate level:

- Asian households earning 0-30% of AMI

Four additional groups do not qualify for “disproportionate need” by a small margin (1-2 percentage points):

- Black households earning 0-30% of AMI
- Black households earning 30-50% of AMI
- Black households earning 50-80% of AMI

- Asian households earning 50-80% of AMI

<b>Racial/ Ethnic Group</b>	<b>0-30% AMI</b>	<b>30-50% AMI</b>	<b>50-80% AMI</b>	<b>80-100% AMI</b>
	<b>% with one or more severe housing problems*</b>			
Jurisdiction as a Whole	75.1%	28.4%	8.7%	3.5%
White	73.4%	27.7%	8.1%	3.8%
Black/ African American	84.2%	37.6%	17.4%	2.2%
Asian	<b>95.5%</b>	0.0%	17.0%	0.0%
Hispanic	71.2%	32.1%	11.7%	0.0%

*\*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%*

It should be noted, however, that non-White groups have very small sample sizes and data on these groups are therefore more prone to error. In each income level, White households represent more than 82-94% of the jurisdiction as a whole, significantly influencing the overall trend.

### 0%-30% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	7,925	2,625	1,120
White	6,415	2,325	740
Black / African American	855	160	45
Asian	434	35	318
American Indian, Alaska Native	0	10	15
Pacific Islander	0	0	0
Hispanic	185	75	0

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2006-2010 CHAS

\*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	3,835	9,650	0
White	3,495	9,125	0
Black / African American	169	280	0
Asian	100	125	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	95	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2006-2010 CHAS

\*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	1,815	19,030	0
White	1,540	17,400	0
Black / African American	135	640	0
Asian	84	409	0
American Indian, Alaska Native	0	65	0
Pacific Islander	0	15	0
Hispanic	45	340	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2006-2010 CHAS

\*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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	454	12,465	0
White	449	11,415	0
Black / African American	10	450	0
Asian	0	275	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	0	155	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2006-2010 CHAS

\*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%

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 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:

HUD defines a disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate at least 10 percentage points greater than that of the corresponding income level as a whole. Cost burdened is defined as paying 30-50% of the household income to housing, and severely cost burdened is defined as paying greater than 50% of the household income to housing. The data table below summarizes the percentage of each racial/ethnic group experiencing cost burden at various levels.

According to the 2006-2010 ACS, the total population of Pacific Islanders in the Consortium is 47 people (0.02% of the total population) and the total population of American Indian and Alaska Natives is 613 people (0.22% of the total population). Given the low share of these populations, the estimates from the ACS and CHAS datasets have relatively large margins of error. As such, these populations are not included in the analysis.

According to the above definitions, one racial/ethnic group in the Consortium experiences cost burden at a disproportionate level:

- Black households paying over 50% of household income

One important finding is that Black households are the most cost burdened group in the Consortium overall, experiencing a total rate of cost burden 20 percentage points higher than White households (47% compared to 27%).

Racial/Ethnic Group	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	72.1%	16.2%	11.7%	1.0%
White	73.2%	15.9%	11.0%	0.8%
Black / African American	53.5%	21.1%	<b>25.4%</b>	1.0%
Asian	65.2%	16.3%	18.5%	9.9%
Hispanic	66.4%	20.5%	13.1%	0.0%

It should be noted that non-White groups have very small sample sizes and data on these groups are therefore more prone to error. For each cost burden level, White households represent more than 82-94% of the jurisdiction as a whole, significantly influencing the overall trend.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	84,190	18,930	13,714	1,190
White	77,890	16,890	11,660	815
Black / African American	2,475	975	1,175	45
Asian	2,094	525	594	318
American Indian, Alaska Native	145	25	10	15
Pacific Islander	15	45	0	0
Hispanic	1,085	335	215	0

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2006-2010 CHAS

## **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 in the ACT HOME Consortium varies primarily by income level. However, the following groups within an income tier and race/ethnicity category experienced problems at a rate at least 10 percentage points higher than the Consortium as a whole:

### **Housing needs**

- Black households earning 30-50% AMI
- Black households earning 50-80% AMI
- Asian households earning 50-80% AMI
- Hispanic households earning 30-50% AMI
- Hispanic households earning 50-80% AMI

### **Severe housing needs**

- Asian households earning 0-30% of AMI

### **Cost burden**

- Black households paying over 50% of household income

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

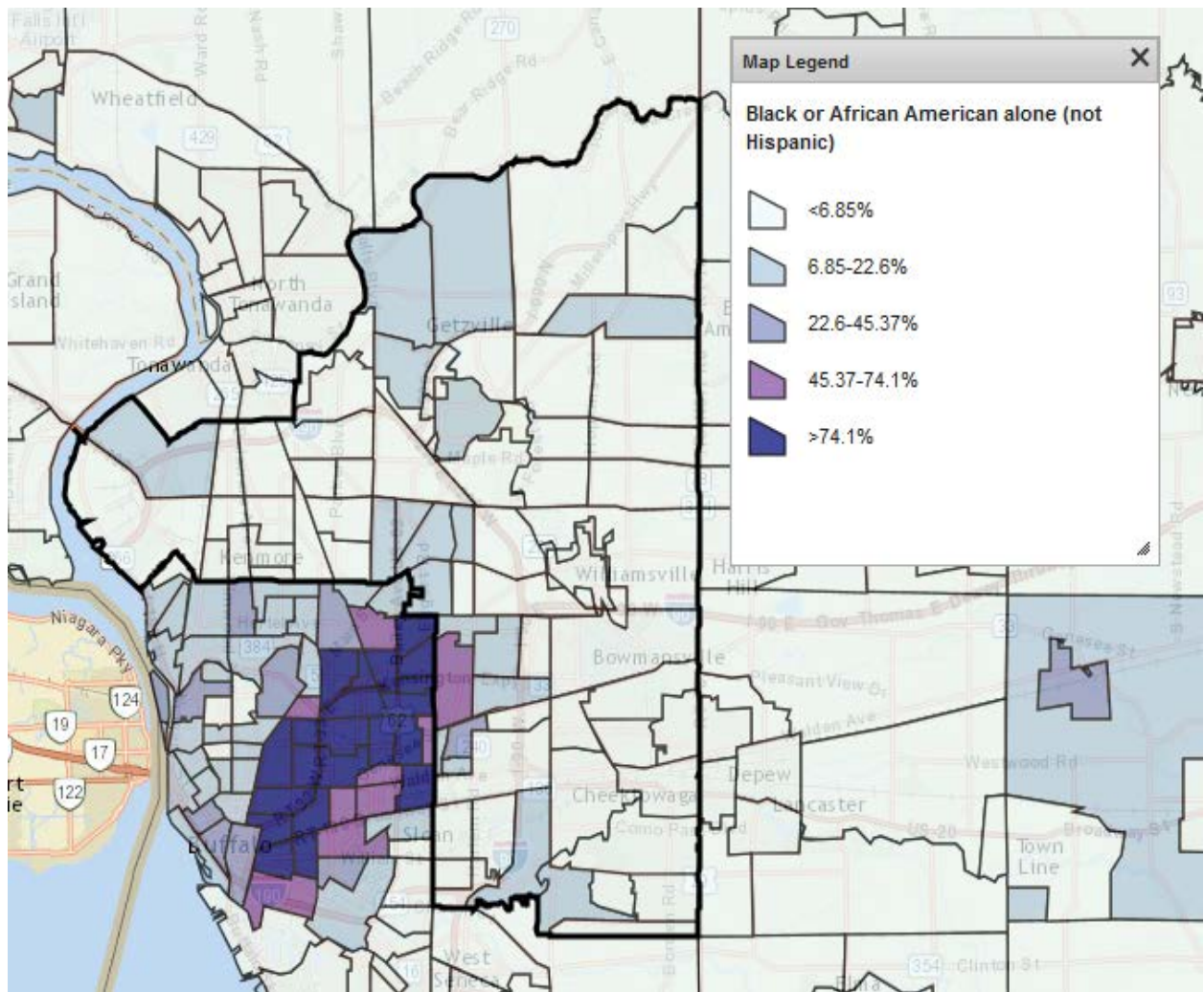
The needs among races/ethnicities are indicated above. Income categories have more general needs, as described in NA-10 and the Housing Market Analysis.

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

As the following maps from HUD's CPDMaps system illustrate, racial and ethnic minorities in Erie County are concentrated primarily in the City of Buffalo, but are also settled with some degree of integration in Amherst, Cheektowaga and Tonawanda. The ACT Consortium communities are shown within a bold border on the maps. Of the census tracts within the ACT

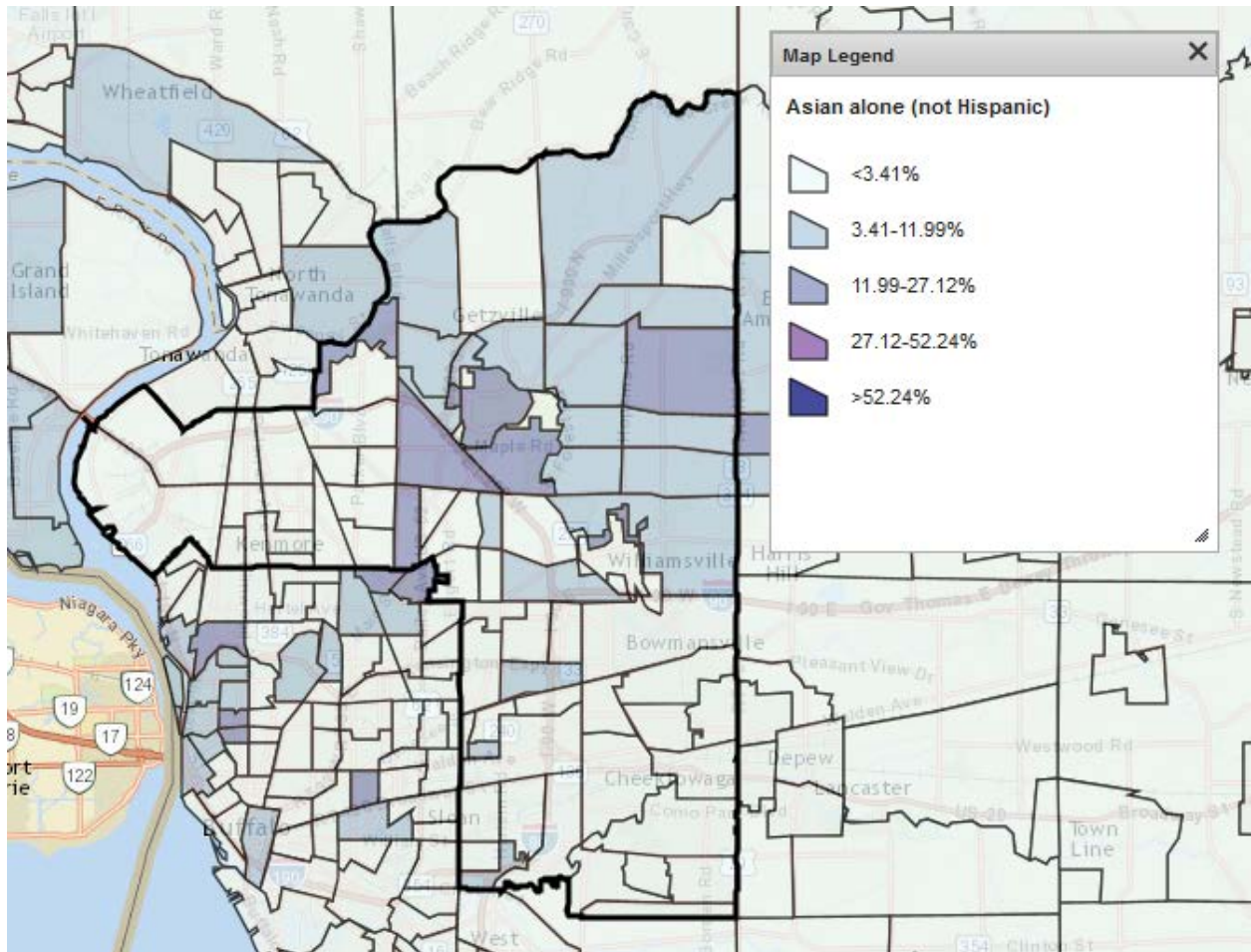
Consortium communities, only two – in Cheektowaga near its border with the City of Buffalo – contain a percentage of Black residents higher than 22.6%. Tracts with more than more than 6.85% Black and multiple-race residents exist in various areas of each community. Asians within the three communities are most likely to be located in Amherst. CPDMaps does not indicate any concentration of Hispanic residents within ACT communities. No other racial category was represented in significant number. The Analysis of Impediments to Fair Housing Choice, a partner document to the Consolidated Plan, will examine integration and settlement patterns and their determinants in greater detail.

**CPDMaps: Percent of Population Black or African-American, 2011**

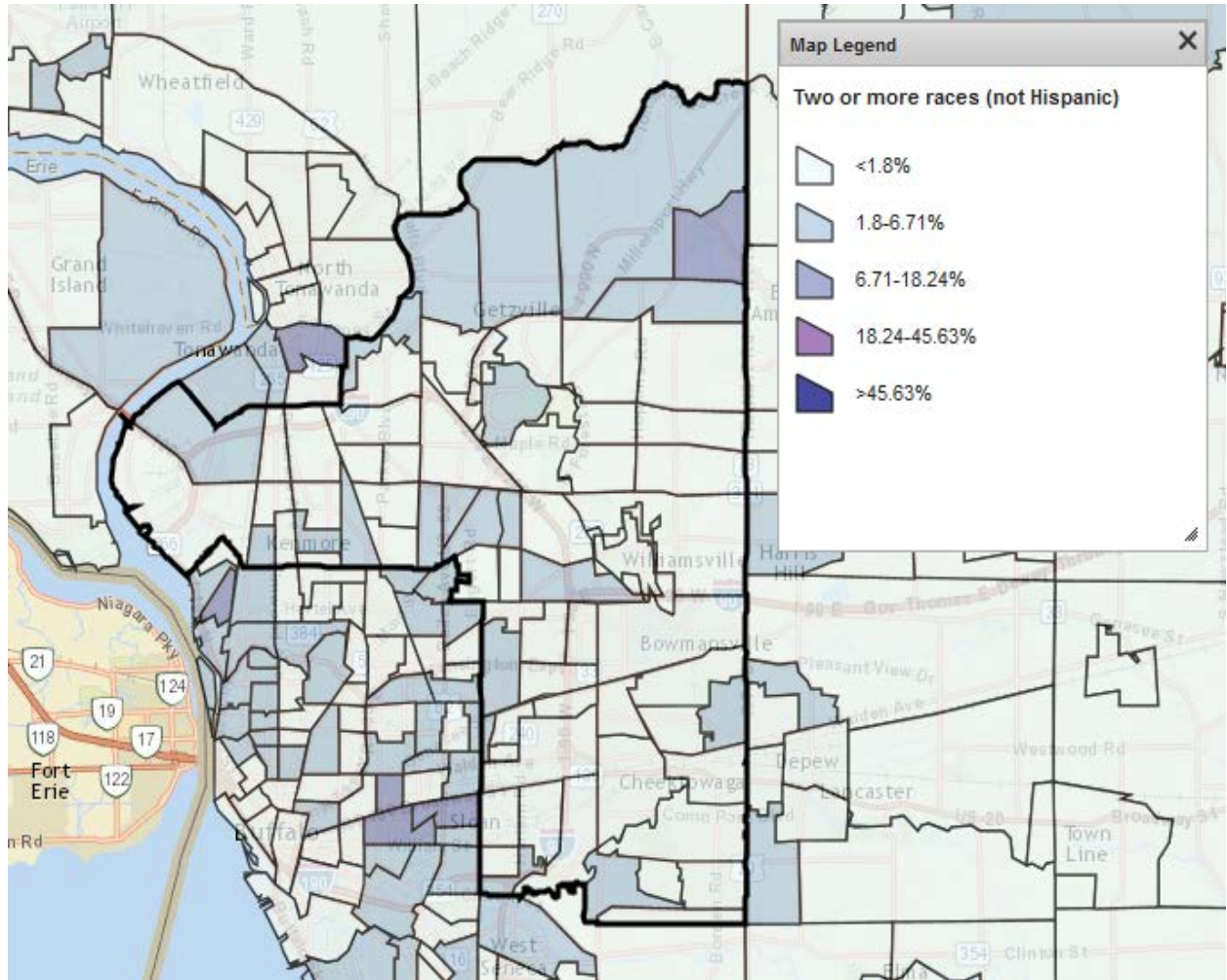




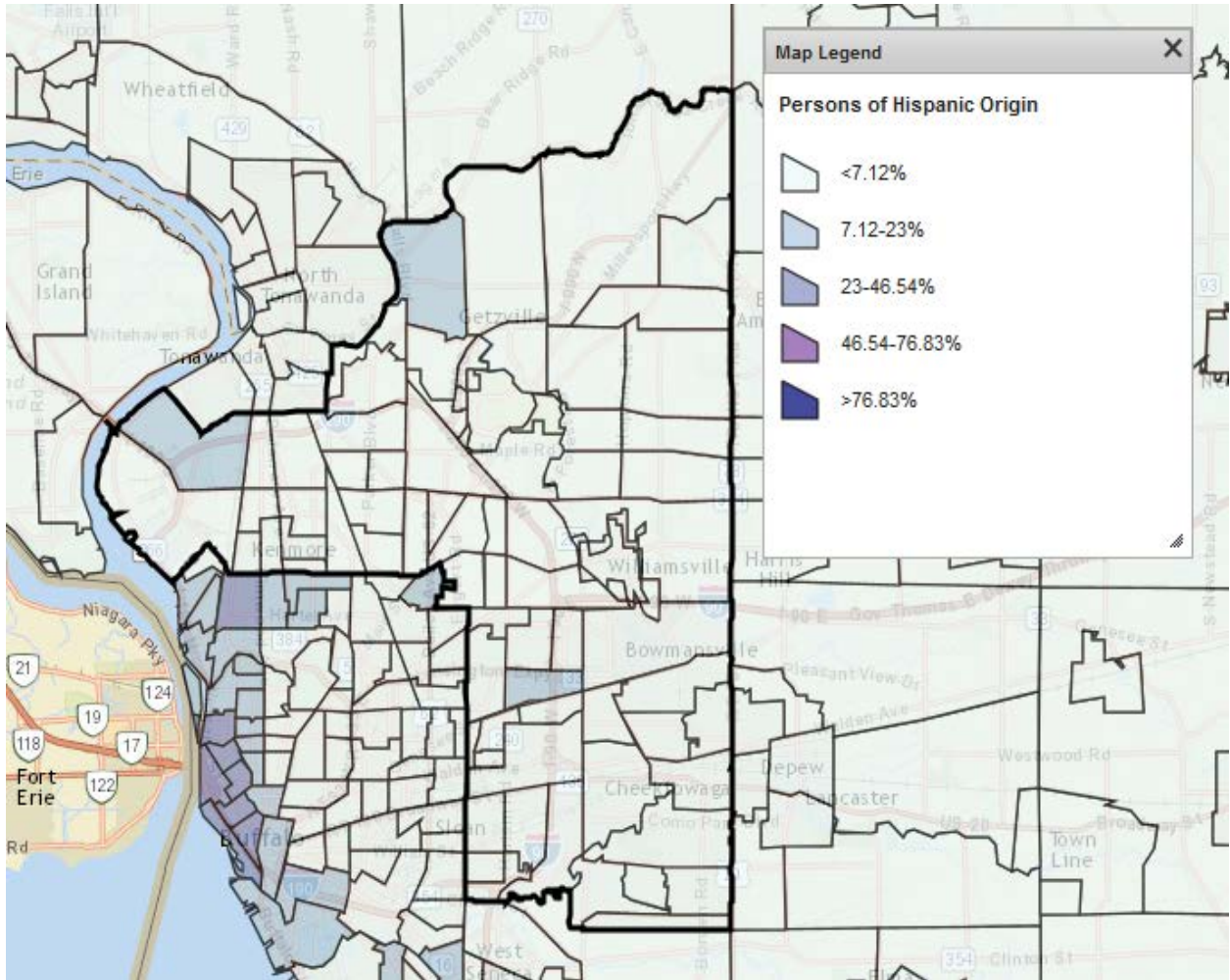
# CPDMaps: Percent of Population Asian, 2011



### CPDMaps: Percent of Population Reporting Two or More Races



### CPDMaps: Percent of Population Hispanic



## NA-35 Public Housing – 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 100 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 (which are based on a total unit count of 194, not the 200 units reported by KHA), 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.

### Totals in Use

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

**Table 22 - 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	Family Unification Program
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 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
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

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
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

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

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

Of the Kenmore Housing Authority (KHA)'s 200 units, 20 are accessible units. As of October 24, 2014, 86 (43%) of KHA's current tenants and 58 (12%) of its waiting list households are households with disabilities. This data indicates a great need for accessible units for elderly citizens.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

Like other housing authorities in the region, KHA continues to address the most immediate needs of its public housing residents by keeping the maximum number of housing authority units possible available and in good condition.

Kenmore does not administer a voucher program. In Erie County, Rental Assistance Corporation (RAC) administers the City of Buffalo's Section 8 vouchers across all of Erie County. The wait list for a RAC voucher exceeds 14,000 and has been closed for about two years. Additionally, Belmont Housing Resources administers Erie County's vouchers throughout the County. Belmont's wait list exceeds 19,000, is seven years long and has been closed since 2011. RAC and Belmont administer a combined total of about 9,000 to 10,000 vouchers.

Overall, an adequate supply of units affordable and available to eligible applicants remains a need for voucher holders, including affordable housing that is accessible for persons with disabilities. Both RAC and Belmont have acknowledged the need to expand the supply and geography of available units by applying an exception payment standard so that voucher holders can afford higher rents in census tracts outside of Buffalo. About 35% of Belmont's voucher holders live in Buffalo, compared to 85% of RAC's, and stakeholders report that the reason for this concentration is the inadequate inventory of affordable units in the balance of the County. Most of the affordable units outside of the City are located in first-ring suburbs. The agencies also regularly allow a payment standard exception for people with disabilities (up to 120% fair market rent), due to the extremely limited supply of units that are available and appropriate for this population.

Additionally, voucher holders with children under age six often face serious difficulty locating a unit due to lead-based paint requirements, as landlords who participate in the program must pay for lead testing to accommodate such families. These households constitute 50-75% of RAC's clientele. Belmont's is about 50% elderly/disabled.



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

The population at large includes households that share the needs of public housing residents and voucher holders, because the resources available to the agencies running these housing programs are drastically insufficient to meet local need. Hundreds of families would apply for a voucher if either wait list were open. Until a unit or voucher becomes available, the thousands of households on the waiting list continue to subsist on extremely low incomes in housing conditions that are likely unaffordable, inadequate or both.

People already served by public housing or voucher programs within the Consortium are more likely to be elderly or people with disabilities than the general population, thus their needs relate to stable, accessible housing and access to related supported services that allow them to live as independently as possible. Transportation that provides affordable, relatively convenient connections to the destinations of daily life (shopping, medical appointments, work, etc.) is critical to the quality of life for public housing residents, voucher holders, the elderly and people with disabilities. Stakeholders who serve these populations cited a lack of or inadequate transportation as a major problem for their clients.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

There is limited Continuum of Care (CoC) data available to describe the nature or extent of homelessness specifically in the towns of Amherst, Cheektowaga and Tonawanda. CoC data on the homeless population is available zip code. However, zip code boundaries do not coincide with municipal boundaries. Some zip codes are split between two or more municipalities.

Using CoC data and extrapolating split zip code homeless data generally by the proportion of the zip code that is in the respective municipalities provides the following estimates of the homeless population in the ACT Consortium towns in 2013:

Amherst – 66

Cheektowaga – 255

Tonawanda – 71

\*The above estimates are the unduplicated count of persons who received homeless services in 2013, classified by the zip code that they reported as their last permanent address.

The following reports from the Continuum of Care (CoC) covering Erie and Niagara counties contain totals for the sheltered and unsheltered homeless population gathered during the January 2014 Point-In-Time (PIT) count. The count located 762 households containing 1,000 persons divided primarily between emergency shelter and transitional housing. CoC data indicates that 81% of the homeless population in the Buffalo-Niagara region is concentrated in the City of Buffalo.

Date of PIT Count: 1/29/2014

Population: Sheltered and Unsheltered Count

**Total Households and Persons**

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Total Number of Households	413	270	15	64	<b>762</b>
Total Number of Persons	518	403	15	64	<b>1,000</b>
Number of Children (under age 18)	113	135		0	<b>248</b>
Number of Persons (18 to 24)	44	58	0	4	<b>106</b>
Number of Persons (over age 24)	361	210	15	60	<b>646</b>

**Gender**

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Female	190	246	9	3	<b>448</b>
Male	328	157	6	61	<b>552</b>
Transgender	0	0	0	0	<b>0</b>

Of the homeless population accounted for in January 2014, 72 individuals qualified as chronically homeless, which HUD defines as an individual or family with a disabling condition who has been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years. More than half of the area’s chronically homeless population was unsheltered. Counts of homeless persons with other conditions, such as mental illness or substance abuse, appear below.

**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

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>

**Ethnicity**

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
Non-Hispanic/Non-Latino	472	308	12	59	851
Hispanic/Latino	46	95	3	5	149

**Race**

	Sheltered			Unsheltered	Total
	Emergency	Transitional	Safe Haven		
White	207	175	7	28	417
Black or African-American	271	196	8	34	509
Asian	1	3	0	0	4
American Indian or Alaska Native	4	2	0	2	8
Native Hawaiian or Other Pacific Islander	0	0	0	0	0
Multiple Races	35	27	0	0	62

**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 at the Consortium level.

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

The majority of the homeless population within Erie and Niagara counties is Black, in stark contrast to the general population of the two counties. Hispanic people are also overrepresented in homelessness compared to their overall population share. This is a fact likely related to the greater extent to which Black and Hispanic households in the area experience cost-burden and other housing problems.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

As shown in the previous table, 54% of homeless households were in emergency shelter, while 35% were in transitional housing, and 2% were in a Safe Haven arrangement. An additional 64 (8%) were unsheltered. None of the unsheltered were children. Nearly two in every three unsheltered people were chronically homeless, many of whom had other issues such as mental illness or substance abuse.

**Discussion:**

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

### **Introduction:**

Persons with special needs include the elderly and frail elderly, persons with developmental and physical disabilities, persons suffering from drug and alcohol addiction, and persons living with HIV/AIDS. Many persons with special needs also have very low incomes.

### **Describe the characteristics of special needs populations in your community:**

#### Elderly

Elderly persons are more likely to live on fixed, very low incomes or require special supportive service to complete their daily routines. This means elderly residents in particular need affordable housing options and easy access to service providers.

Representatives from organizations that work with seniors indicate that there is a growing need for affordable senior housing. Seniors in the Consortium express desires to “age in place,” but many also need housing that will accommodate physical disabilities. However, American Community Survey data for the Consortium shows that the senior population decreased at a more rapid rate than the population as a whole. The senior population decreased at a rate of 6.5%, from 56,196 in 2000 to 52,563 in 2010, compared to a 1.6% decrease in the population as a whole.

According to ACS data, 31.8% of households in the Consortium contain at least one person age 65 or over. Seniors are less likely than the general population to have incomes below the poverty line and over 150% of the poverty level, but are more likely to have incomes between 100% and 150% of the poverty level. In addition, the Census reported that 31.0% of persons 65 years and over had at least one disability in 2012.

#### People Living with Disabilities

There were 32,058 persons with disabilities in the Consortium in 2010, representing 11.4% of the population. The most common disability reported was ambulatory, meaning difficulty walking or moving around. More than 16,000 persons reported this disability. Approximately 13.4% of persons with a disability also live in poverty, compared to 8.8% of the general population.

[Awaiting data on developmental disabilities from Office of People with Development Disabilities]

### Substance Abuse and Addiction

No local data was available to describe the extent or housing needs of this population.

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

See above estimates.

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

According to the County Health Assessment for 2014-2017 published by the Erie County Department of Health, AIDS is the leading cause of death across the County for both male and female Black persons and Hispanic males age 30 to 39. It is the second leading cause of death for Hispanic females age 30 to 39. The County notes that infection trends have shifted in recent decades from White gay males to communities of color. In particular, heterosexual women of color “are becoming infected at an alarming rate,” and many are unaware that they are infected.

Available data was reported countywide, as no local statistics exist that would identify cases in Amherst, Cheektowaga or Tonawanda separately. Across Erie County, there were 858 HIV cases and an additional 1,013 AIDS cases in 2011. The number of new HIV/AIDS diagnoses has stabilized and shown some decline in recent years. However, Erie County has the highest rate of AIDS cases (excluding prisoners) in the eight-county region with a cumulative incidence of 159.2 cases per 100,000 population. The County’s cases are concentrated in Buffalo, where the incidence rate is 359 per 100,000 residents. The statewide rate, excluding New York City, is 251.5 per 100,000.

In addition to further outreach, awareness and coordination that is needed to prevent further transmission, the County Health Assessment concluded that there is a need for more shelters available in the community. Additionally, special attention needs to be provided to those who know they are HIV-positive to ensure that they receive and maintain care. The housing needs of this population are difficult to enumerate, but stakeholders have made it clear that supportive services are of paramount importance.



## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Through CDBG funds, the Consortium can fund the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for disabled persons).

The overall community development focus of the Consortium towns is to maintain the suitable living environment that they now enjoy. Accordingly, the towns will continue to focus CDBG resources on actions designed to rebuild infrastructure, encourage reinvestment, improve the quality of life and create employment opportunities for low- and moderate-income residents.

### **How were these needs determined?**

The Consortium towns have extensive park and recreation systems that are ideally integrated into the residential environment. Neighborhood parks and playgrounds exert a positive impact on the quality of life of area residents and assist in supporting neighborhood stability and property values. The age of public facilities in the three towns requires a systematic approach to maintenance, with repairs and updates made as needed to prevent or mitigate deterioration.

Needs are identified through the towns’ comprehensive land use plans, neighborhood plans, and capital improvements program.

### **Describe the jurisdiction’s need for Public Improvements:**

Through CDBG funds, the Consortium can also fund the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance and ADA compliance construction and rehabilitation.

The Consortium communities want to prevent or reduce deterioration in neighborhoods by undertaking, as necessary, the installation of new or the replacement of deteriorated curbs, streets, sidewalks, fire hydrants, storm drainage, sanitary sewer, water mains, tree planting and the installation of traffic signals and signs and street signs.

### **How were these needs determined?**

Needs for public facilities and public improvements are identified through the towns’ comprehensive land use plans, neighborhood plans, and the Towns’ Capital Improvements Program.

The Consortium towns will review older neighborhoods to monitor conditions and needs. Each year, CDBG funds will be used to address street and infrastructure needs, thereby strengthening and protecting existing viable components of neighborhoods through the elimination of existing or potential threats to the public health, safety and general welfare of residents of the towns.

**Describe the jurisdiction's need for Public Services:**

Through CDBG funds, the Consortium can fund an array of public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, elderly care and programs, and child care and health services.

Overall, the public services funded through Consortium programs are directed to youth and senior citizens, those in need of various counseling services related to housing, domestic violence and other needs. Services are particularly targeted to low- and moderate-income neighborhoods.

Other public service needs to be addressed by the Consortium towns include services to homeless or runaway youth; domestic violence prevention counseling and emergency shelter for victims of domestic violence at Haven House; family service counseling; and after-school programs and summer day camp for low- and moderate-income youth.

The Northtown satellite office of the Family Justice Center in Amherst opened in 2014 to assist victims of domestic violence. The volunteers at this office offer a safe and secure site to assist the persons seeking help, and a number of services are represented, thereby eliminating the need for clients to travel around to various sites to access services.

All three Consortium towns have identified neighborhood business district development and revitalization as a priority community development need. Businesses expanding or locating in the Consortium towns will be provided with financial assistance through CDBG-funded business incentive programs creating employment opportunities for low- and moderate-income persons.

In order to maintain the quality of buildings within the towns, it is necessary to conduct periodic inspections of existing commercial and industrial buildings and housing units in certain areas. The Consortium towns will undertake code enforcement activities in older neighborhoods and in areas that are saturated with rental housing.

Except for the City of Buffalo, transportation is a major issue throughout Erie County, one that permeates many aspects of life. The lack of or inadequate public transportation makes it difficult or impossible for anyone who does not have access to a car to get to work, obtain

services, access medical care, go shopping, etc. Although public transportation is better in first ring suburbs like the ACT Consortium communities than in the County's more remote municipalities, transportation remains a major obstacle for many Consortium residents. A lack of reliable transportation often prevents Consortium residents from finding and/or keeping jobs. Without jobs, people often fall into poverty, and poverty is the leading cause of homelessness. The ACT Consortium towns will continue to work with county and regional agencies to improve/increase/expand public transportation within the Consortium.

**How were these needs determined?**

Ongoing assessment of the services now provided will determine the point and time when additional services shall be provided.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The ACT Consortium is composed of multiple communities with unique housing assets and needs. This analysis identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ultimately, the Consortium is working to ensure that a mix of housing types exists within each community to accommodate households of all types and income levels while preserving local heritage and history. The Consortium's housing strategies will be especially informed by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

The housing markets in Amherst, Cheektowaga and Tonawanda are economically linked to the nearby City of Buffalo, with many areas of these communities being used as bedroom communities. The housing stock in the ACT Consortium is predominantly owner-occupied and single-family. Renter housing tends to have fewer bedrooms and is more likely to be located in multi-family buildings. The need for more affordable housing, both owner- and renter-occupied, is strong in the community. The Consortium’s most critical housing needs are improving the existing housing stock, promoting affordable homeownership, improving housing to homeless and special needs populations, and owner-occupied rehabilitation and weatherization.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	81,606	65%
1-unit, attached structure	4,320	3%
2-4 units	23,013	18%
5-19 units	10,117	8%
20 or more units	5,224	4%
Mobile Home, boat, RV, van, etc	1,424	1%
<b>Total</b>	<b>125,704</b>	<b>100%</b>

**Table 26 – Residential Properties by Unit Number**

Data Source: 2006-2010 ACS

### Residential Properties by Unit Number

Property Type	ACT Consortium Total		Amherst		Cheektowaga		Tonawanda	
	Number	%	Number	%	Number	%	Number	%
1-unit detached structure	81,606	65%	32,311	64%	26,204	63%	23,091	69%
1-unit, attached structure	4,320	3%	2,802	6%	1,009	2%	509	2%
2-4 units	23,013	18%	7,875	16%	9,346	23%	5,792	17%
5-19 units	10,117	8%	4,622	9%	2,864	7%	2,631	8%
20 or more units	5,224	4%	2,996	6%	716	2%	1,512	4%
Mobile Home, boat, RV, van, etc	1,424	1%	119	0%	1,223	3%	82	0%
<b>Total</b>	<b>125,704</b>	<b>100%</b>	<b>50,725</b>	<b>100%</b>	<b>41,362</b>	<b>100%</b>	<b>33,617</b>	<b>100%</b>

Data Source: 2006 - 2010 ACS

## Unit Size by Tenure

Of the 86,103 owner-occupied units in the Consortium, 83% consist of three or more bedrooms. This is in stark comparison to renter-occupied units, of which only 26% include three or more bedrooms. Nearly half of renter households live in two-bedroom units.

	Owners		Renters	
	Number	%	Number	%
No bedroom	104	0%	800	2%
1 bedroom	898	1%	7,138	22%
2 bedrooms	13,715	16%	16,298	49%
3 or more bedrooms	71,386	83%	8,709	26%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>99%</b>

Table 27 – Unit Size by Tenure

Data Source: 2006-2010 ACS

Property Type	ACT Consortium Total				Amherst			
	Owners		Renters		Owners		Renters	
	Number	%	Number	%	Number	%	Number	%
No bedroom	104	0%	800	2%	33	0%	240	2%
1 bedroom	898	1%	7,138	22%	500	1%	3,440	26%
2 bedrooms	13,715	16%	16,298	49%	5,635	16%	6,191	47%
3 or more bedrooms	71,386	83%	8,709	26%	28,819	82%	3,388	26%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>99%</b>	<b>34,987</b>	<b>100%</b>	<b>13,259</b>	<b>100%</b>

Data Source: 2006 - 2010 ACS

## Unit Size by Tenure

Property Type	Cheektowaga				Tonawanda			
	Owners		Renters		Owners		Renters	
	Number	%	Number	%	Number	%	Number	%
No bedroom	56	0%	191	2%	15	0%	369	4%
1 bedroom	300	1%	1,449	13%	98	0%	2,249	26%
2 bedrooms	4,552	16%	6,055	56%	3,528	15%	4,052	46%
3 or more bedrooms	22,795	82%	3,177	29%	19,772	84%	2,144	24%
<b>Total</b>	<b>27,703</b>	<b>100%</b>	<b>10,872</b>	<b>100%</b>	<b>23,413</b>	<b>100%</b>	<b>8,814</b>	<b>100%</b>

Data Source: 2006 - 2010 ACS

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

The Consortium utilizes public funds to address the priority needs and specific objectives identified in its annual action plan. The Towns of Amherst and Cheektowaga do not have any public housing developments, but the Kenmore Housing Authority has two senior high-rise developments in the Town of Tonawanda. Multi-family rental units are available with rental assistance through project specific vouchers and Section 8 assistance. The Consortium towns have contracted with Belmont Housing Resources for WNY to administer the Section 8 tenant-based voucher program.

According to the Belmont housing inventory, in Amherst, there are 1,629 total assisted units among nine developments. Of this inventory, 680 units and four developments are senior housing, and 1,205 and five developments are family housing (the categories are not mutually exclusive). Rent was based on income (BOI) for 829 of the total units.

In Cheektowaga, there are 693 total assisted housing units between nine developments according to the Belmont housing inventory. Of this inventory, 401 units and five developments are senior housing, and 24 units in one development is family housing. Rent was BOI for 247 of these units.

In Tonawanda, there are 488 total assisted units between four developments according to the Belmont housing inventory. Of this inventory, 149 units and two developments are senior housing. Rent was BOI for 413 of these units.

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

At-risk units were determined using the National Housing Trust's database on expiring project-based rental assistance, which includes project-based Section 8, Section 202, Section 811, RAP, LIHTC, and HOME. In Amherst, there are 193 project-based Section 8 vouchers that will expire over the next five years, 20 of which are Section 202/811. In Cheektowaga, there are seven project-based Section 8 vouchers that will expire over the next five years. In Tonawanda there are 10 project-based Section 8 vouchers that will expire over the next five years, all of which are from a single Section 202 contract. These units are at-risk for conversion to market rates once their contracts expire, unless intervention occurs to preserve the affordability of these units.

From 2014 through 2018, the National Housing Trust database indicates that the affordability designation is set to expire for units funded through project-based rental assistance. Because significant government funding has been invested in these properties, this housing is some of the most affordable housing in the Consortium. The ACT Consortium will continue to monitor this database over the next five years to assess if and when any units could be lost due to expiring contracts and what actions the Consortium can take to preserve these units.

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

Like most of the nation, the ACT Consortium is currently experiencing a significant shortage of affordable and available rental units for extremely low, low, and even moderate-income households. Stakeholder interviews indicated a large need for senior housing, as many seniors want to age in place but are unable to find suitable housing.

As discussed in the Needs Assessment, there are approximately 35,999 renter households in the Consortium, which comprise 30% of all households. Renter households experience disproportionately high rates of housing problems (such as cost burden, overcrowding, or inadequate/substandard housing) compared to owner households, are more likely to include people with disabilities, and tend to have lower incomes compared to owner households. Almost half of rental units (49%) in the Consortium are two-bedroom units. In contrast, the majority of owner-occupied units are three-bedroom units. Just 15% of owner-occupied units have two bedrooms.

There is a need for more affordable housing units in the Consortium, particularly for renters. Stakeholders interviewed during the Consolidated Plan process provided anecdotal evidence of the need demonstrated by the HUD data. However, the severely limited resources available to the Consortium, combined with the many and varied housing and community development needs of the three Consortium towns, effectively preclude their ability to address affordable rental housing needs beyond their current efforts to rehabilitate rental units in 2-4 unit structures that include an owner-occupied unit.

### **Describe the need for specific types of housing:**

The communities in the ACT Consortium are experiencing changes in demographic composition that require a new plan to ensure that all residents have access to the optimal type of housing. While families are continuing to take advantage of these communities' strategic locations as first-ring suburbs of Buffalo, stakeholders interviewed also mentioned that other new residents move to these areas because they offer a level of opportunity that is relatively less expensive than comparable housing in Buffalo. At the same time, the ACT Consortium will also see a rising number of seniors in the coming years, reflecting national and regional trends.

To appropriately meet the needs of this Consortium, there are identified three core areas of focus. Based on prior discussions in this plan about the housing needs of the Consortium's populations, there is a need for safe, secure, and affordable housing throughout the ACT Consortium. Specifically, there is a strong need for rental housing affordable to households making less than 80% of the median income, and practical options are needed to ensure that the growing number of elderly households can either age in place or be accommodated in smaller, accessible and low-maintenance units. Maintaining and improving the existing



affordable housing stock—especially historic structures—was identified as particularly important in both the Annual Action Plan and stakeholder interviews.

## MA-15 Housing Market Analysis: Cost of Housing - 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 \$736. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn \$2,453 monthly or \$29,436 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a “Housing Wage” of \$14.15.

In New York, a minimum wage worker earns an hourly wage of \$8.00. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 71 hours per week, 52 weeks per year. Alternatively, a household must include 1.8 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

### Cost of Housing

	ACT Consortium Total			Amherst			Cheektowaga			Tonawanda		
	Base Year: 2000	Most Recent Year: 2012	% Change	Base Year: 2000	Most Recent Year: 2012	% Change	Base Year: 2000	Most Recent Year: 2012	% Change	Base Year: 2000	Most Recent Year: 2012	% Change
Median Home Value	NA	NA	NA	\$120,000	\$168,700	41%	\$81,800	\$96,600	17%	\$85,100	\$111,900	31%
Median Contract Rent	NA	NA	NA	\$598	\$795	33%	\$468	\$609	30%	\$467	\$596	28%

Data Source: Census 2000, 2008-2012 ACS

Please note that the above tables do not serve as the basis for HOME Program assisted unit value thresholds. The ACT Consortium will review the HOME Program assisted unit value thresholds annually and may adjust the threshold based on the previous year’s home sales data as required by HOME Program regulations.

Rent Paid	Number	%
Less than \$500	9,443	28.7%
\$500-999	20,732	62.9%
\$1,000-1,499	1,813	5.5%
\$1,500-1,999	403	1.2%
\$2,000 or more	554	1.7%
<b>Total</b>	<b>32,945</b>	<b>100.0%</b>

**Table 28 - Rent Paid**

Data Source: 2006-2010 ACS

**Rent Paid**

Rent Paid	ACT Consortium Total		Amherst		Cheektowaga		Tonawanda	
	Number	%	Number	%	Number	%	Number	%
Less than \$500	9,443	29%	1,793	14%	884	8%	1,213	14%
\$500-999	20,732	63%	6,729	53%	8,504	82%	6,732	79%
\$1,000-1,499	1,813	6%	3,081	24%	840	8%	515	6%
\$1,500-1,999	403	1%	687	5%	101	1%	46	1%
\$2,000 or more	554	2%	459	4%	97	1%	51	1%
<b>Total</b>	<b>32,945</b>	<b>100%</b>	<b>12,749</b>	<b>100%</b>	<b>10,426</b>	<b>100%</b>	<b>8,557</b>	<b>100%</b>

Data Source: 2006-2010 ACS

**Housing Affordability**

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 1,735 rental units identified as affordable to households below 30% of HUD Area Median Family Income (HAMFI) represents 6.2% of the rental housing inventory in the Consortium.

Units affordable to Households earning	Renter	Owner
30% HAMFI	1,735	No Data
50% HAMFI	6,695	6,375
80% HAMFI	19,335	22,040
100% HAMFI	No Data	31,945
<b>Total</b>	<b>27,765</b>	<b>60,360</b>

**Table 29 – Housing Affordability**

Data Source: 2006-2010 CHAS

**Monthly Rent**

In the ACT Consortium, the Fair Market Rent (FMR) for a two-bedroom apartment is \$736. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,453 monthly or \$29,440 annually. Assuming a 40-hour work week, 52 weeks per year, the level of income translates into a Housing Wage of \$14.15.

In the ACT Consortium, a minimum-wage worker earns an hourly wage of \$8. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work approximately 70 hours per week, 52 weeks per year.

The monthly rent affordable at minimum wage for a 40-hour work week in the ACT Consortium

is \$384, or about one-half of FMR.

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	557	591	736	941	1,065
High HOME Rent	589	596	736	941	1,065
Low HOME Rent	578	596	736	859	958

**Table 30 – Monthly Rent**

**Data Source:** HUD FMR and HOME Rents

### **Is there sufficient housing for households at all income levels?**

No. The analysis above shows that there is insufficient housing for extremely low and low-income households in the ACT Consortium. HUD calculates the median family income for Fiscal Year 2010 in the Buffalo MSA as \$63,700. Extremely low-income residents (30% or less of median family income) earn less than \$19,100 per year. Although there are 12,279 households in the Consortium earning between \$0 and \$14,999 per year (and more between \$15,000 and \$19,100), there are just 1,735 rental housing units that are affordable to households earning 30% of the median income – only one affordable unit for more than seven households. The supply of rental units does not come close to accommodating the households earning less than 30% HAMFI. As previously noted, the severely limited resources available to the Consortium to address a myriad of housing and community development needs preclude the ability of the Consortium towns to address this rental housing need beyond their current rehabilitation programs.

Despite historically low mortgage interest rates, many households who would normally be seeking to buy are unable to do so due to lenders' tighter lending standards. They remain in the rental market, putting upward pressure on rents across the income spectrum.

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

According to 2012 ACS estimates, mean home values and median rents have increased significantly in the last 12 years. In the ACT Consortium, the tables in the “Cost of Housing” section above show that median rents increased approximately 30% in 12 years, not adjusting for inflation. The change in median home values, however, varied widely. In Amherst, which already had the highest median home value in 2010, the median increased by 41%. Cheektowaga, on the other hand, had the lowest median home value in 2000 and increased by just 17%. Without significant production of new affordable rental units, this trend is expected to continue, meaning housing is likely to become less affordable over time.

These figures demonstrate that housing affordability varies between the three towns. In both 2000 and 2012, Amherst had the highest median home values and the highest median rents. Cheektowaga and Tonawanda had almost identical median home values and median rents in 2000, but by 2012, median rents had increased at the same pace. However, Tonawanda’s median home value increased at twice the rate of Cheektowaga’s. It is interesting to note that while Cheektowaga and Tonawanda gained over 1,000 housing units between the two towns, Amherst gained around 4,000 new housing units between 2000 and 2012.

A local Realtor provided information on the local housing market that indicates the likelihood that housing will become less affordable over the next five years. Demand for single family homes is high, and the inventory of such homes is low, resulting in rising home purchase prices that make housing less affordable.

The Realtor stated that the ACT Consortium towns have good housing in the \$150,000+ price range, but lower price housing often needs substantial rehabilitation to make the houses decent, safe and sanitary. In many cases, the cost of the needed rehabilitation makes the house unaffordable for interested potential buyers. The Realtor also noted that, due in large part to the age of the ACT Consortium’s housing stock, the supply of accessible housing units is very limited, and many older homes cannot be adapted for accessibility.

The Realtor’s information underscores the need for rehabilitation programs that will preserve or increase the supply of affordable housing in the ACT Consortium towns, including accessible units for people with disabilities and housing for the towns’ large elderly populations.

## **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Utilizing the data in the “Cost of Housing” section above reveals the following about median rents in the Consortium compared to HOME rents and Fair Market Rent:

In Amherst, Area Median Rent is higher than HOME rents and Fair Market Rent for efficiency, one-bedroom and two-bedroom units, but lower than HOME rents and Fair Market Rent for three-bedroom and four-bedroom units.

In Cheektowaga and Tonawanda, Area Median Rent is higher than or equal to HOME rents and Fair Market Rent for efficiencies and one-bedroom units, but lower than HOME rents and Fair Market Rent for two-bedroom, three-bedroom and four-bedroom units.

Increasing the supply of affordable housing, particularly rental housing for families and the elderly is an ongoing need of the Consortium. However, rising construction costs and the Consortium's limited allocations of CDBG and HOME funds prohibit the development of new affordable housing units. Also, it is more cost-effective to preserve existing affordable housing than it is to build new replacement housing in the current housing market in the ACT Consortium. Therefore, the Consortium communities will seek to maximize the impact of their housing development funds by continuing their residential rehabilitation programs that preserve existing affordable housing.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

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

### Definitions

**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.

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

**Substandard – Not Suitable for Rehabilitation:** A dwelling unit that requires rehabilitation, including lead hazard testing and the removal/abatement of lead hazards, at a cost that exceeds 70% of the post-rehabilitation value, is considered not suitable for rehabilitation. A dwelling unit under this definition is considered a substandard dwelling unit. An occupied or vacant dwelling unit that is not suitable for rehabilitation and therefore remains substandard is deemed to be not habitable. A dwelling unit that is not habitable is not subject to the one-for-one replacement rule.

**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%.

### Condition of Units

The following tables indicate 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. Approximately 41% of renter-occupied units in the Consortium experience at least one condition, while only around 22% of owner-occupied housing units experience one housing condition. These shares are relatively constant in each of the three towns. Very few owner-occupied units in any of the three towns experience more than one condition, but renter-occupied units are more likely to experience more than one condition.

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	18,722	22%	13,583	41%
With two selected Conditions	184	0%	640	2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With three selected Conditions	16	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	67,181	78%	18,722	57%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>100%</b>

Table 31 - Condition of Units

Data Source: 2006-2010 ACS

### Condition of Units

	ACT Consortium Total				Amherst			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
With one selected Condition	18,722	22%	13,583	41%	7,469	21%	5,899	44%
With two selected Conditions	184	0%	640	2%	79	0%	310	2%
With three selected Conditions	16	0%	0	0%	0	0%	0	0%
With four selected Conditions	0	0%	0	0%	0	0%	0	0%
No selected Conditions	67,181	78%	18,722	57%	27,439	78%	7,050	53%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>100%</b>	<b>34,987</b>	<b>100%</b>	<b>13,259</b>	<b>100%</b>

Data Source: 2006-2010 ACS

	Cheektowaga				Tonawanda			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
With one selected Condition	6,346	23%	4,235	39%	4,907	21%	3,449	39%
With two selected Conditions	94	0%	203	2%	11	0%	127	1%
With three selected Conditions	16	0%	0	0%	0	0%	0	0%
With four selected Conditions	0	0%	0	0%	0	0%	0	0%
No selected Conditions	21,247	77%	6,434	59%	18,495	79%	5,238	59%
<b>Total</b>	<b>27,703</b>	<b>100%</b>	<b>10,872</b>	<b>100%</b>	<b>23,413</b>	<b>100%</b>	<b>8,814</b>	<b>100%</b>

Data Source: 2006-2010 ACS



One of the highest priorities of the Town of Cheektowaga is the upkeep of its neighborhoods. As a result, The Town of Cheektowaga conducts 2-3 neighborhood outreaches per year. Departments such as Code Enforcement, Sanitation, Highway, Youth & Recreation, Senior Services and the Police Department walk door-to-door meeting with residents and providing informational packets to every door within designated neighborhoods. The outreaches are intended to educate the residents on their responsibilities for the upkeep of the neighborhood and provide information on Town programs and departments that may assist in the maintenance of their property. Any problems identified during the outreach are forwarded to the appropriate department. In particular, housing code are forwarded to inspectors for follow-up.

The ACT Consortium communities will continue to maximize the impact of their limited federal grant resources by addressing substandard housing conditions via homeowner rehabilitation programs for one- and two-unit structures, thereby preserving affordable housing.

## Year Unit Built

When compared to the country as a whole, the ACT Consortium has a relatively older housing stock. While just over 19% of the nation’s overall housing stock was built before 1950, more than 25% of the Consortium’s housing units were built before 1950. Both owner- and renter-occupied housing units exhibit similar shares for households built in the four time periods presented in the table below, suggesting that both owner and rental units may require rehabilitation.

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,058	2%	2,195	7%
1980-1999	9,837	11%	5,259	16%
1950-1979	52,962	62%	17,188	52%
Before 1950	21,246	25%	8,303	25%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>100%</b>

**Table 32 – Year Unit Built**

Data Source: 2006-2010 CHAS

## Year Unit Built

	ACT Consortium Total				Amherst			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
2000 or later	2,058	2%	2,195	7%	1,615	5%	1,630	12%
1980-1999	9,837	11%	5,259	16%	7,195	21%	3,302	25%
1950-1979	52,962	62%	17,188	52%	20,056	57%	6,570	50%
Before 1950	21,246	25%	8,303	25%	6,121	17%	1,757	13%
<b>Total</b>	<b>86,103</b>	<b>100%</b>	<b>32,945</b>	<b>100%</b>	<b>34,987</b>	<b>100%</b>	<b>13,259</b>	<b>100%</b>

Data Source: 2006-2010 ACS

	Cheektowaga				Tonawanda			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
2000 or later	350	1%	413	4%	93	0%	152	2%
1980-1999	2,271	8%	1,204	11%	371	2%	753	9%
1950-1979	18,853	68%	6,073	56%	14,053	60%	4,545	52%
Before 1950	6,229	22%	3,182	29%	8,896	38%	3,364	38%
<b>Total</b>	<b>27,703</b>	<b>100%</b>	<b>10,872</b>	<b>100%</b>	<b>23,413</b>	<b>100%</b>	<b>8,814</b>	<b>100%</b>

Data Source: 2006-2010 ACS

### Risk of Lead-Based Paint Hazard

Child poisoning from contact or ingestion of lead-based paint has been considered a major health problem by the Center for Disease Control (CDC). Lead poisoning may cause decreases in IQ, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior. Under a state funded and mandated program, the Erie County Department of Health (DOH) is required to respond to all cases of children with elevated blood levels.

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are considered at risk for containing lead-based paint.

Considering the age of housing stock in the ACT Consortium, there is a substantial risk for lead-based paint hazards. As indicated below, more than 86% of owner-occupied housing units and 77% of renter-occupied units were constructed before 1980, indicating a high risk for the presence of lead-based paint in these housing units.

Stakeholders interviewed stated that the Erie County Department of Health is noticing an increase in lead-based paint exposure cases in suburban areas of Buffalo such as the ACT Consortium communities. However, Department of Health records indicate that there are very few cases of children with elevated blood levels in the suburbs. In 2012, there were 34 such cases, and in 2013 there were just 24.

The homeowner rehabilitation programs offered by the Consortium members help address lead-based paint issues in homes via mandatory lead-based paint risk assessments and the use of lead-based paint certified contractors.

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	74,208	86%	25,491	77%
Housing Units built before 1980 with children present	555	1%	48,028	146%

**Table 33 – Risk of Lead-Based Paint**

Data Source: 2006-2010 ACS (Total Units) 2006-2010 CHAS (Units with Children present)

### Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	ACT Consortium Total				Amherst			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
Total Number of Units Built Before 1980	74,208	86%	25,491	77%	26,177	75%	8,327	63%
Housing Units build before 1980 with children present	NA	NA	NA	NA	NA	NA	NA	NA

Data Source: 2006-2010 ACS (Total Units)  
2006-2010 CHAS (Units with Children present)

Risk of Lead-Based Paint Hazard	Cheektowaga				Tonawanda			
	Owner-Occupied		Renter-Occupied		Owner-Occupied		Renter-Occupied	
	Number	%	Number	%	Number	%	Number	%
Total Number of Units Built Before 1980	25,082	91%	9,255	85%	22,949	98%	7,909	90%
Housing Units build before 1980 with children present	NA	NA	NA	NA	NA	NA	NA	NA

Data Source: 2006-2010 ACS (Total Units)  
2006-2010 CHAS (Units with Children present)

### Vacant Units

The following table was generated by the HUD Consolidated Planning template, through which no data was available. According to the American Community Survey, 5,976 housing units throughout the Consortium were vacant in 2012. Of these vacancies, 2,834 (47.4%) were vacant for reasons other than being for sale or for rent, sold or rented but not occupied, for migrant workers, or for seasonal use. No data was available on the condition of vacancies and whether

they might be suitable for rehabilitation.

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

Table 34 - Vacant Units

### Vacancy Units

	ACT Consortium	Amherst	Cheektowaga	Tonawanda
<b>Total</b>	<b>5976</b>	<b>2,526</b>	<b>2,956</b>	<b>494</b>
For rent	1288	724	396	168
Rented, not occupied	364	183	151	30
For sale only	851	383	400	68
Sold, not occupied	291	110	181	0
For seasonal, recreational, or occasional use	348	291	57	0
For migrant workers	0	0	0	0
Other vacant	2834	835	1,771	228

Data Source: ACS 2012 5-year estimates

The Buffalo Erie Niagara Land Improvement Corporation, which functions as the local land bank, estimates that there are 2,500-3,000 vacant units in the ACT Consortium, including Real Estate Owned (REO) properties. No data is available on the number of vacant units that are abandoned units, or the number of vacant units that are suitable for rehabilitation.

The large number of vacant residential units in the Consortium (some as a result of the recent mortgage crisis) continues to pose significant problems. The vacant units detract from property values in their neighborhoods (some studies indicate by as much as \$11,000), and the Consortium towns have few tools to address this issue. One of these tools, tax foreclosures, can only occur after three years of unpaid taxes, during which time the vacant units continue to have a detrimental effect on surrounding properties and neighborhoods. The aforementioned Buffalo Erie Niagara Land Improvement Corporation is another tool that the ACT Consortium towns can use to address the growing problem of vacant houses.

### Need for Owner and Rental Rehabilitation

The ACT Consortium has identified housing rehabilitation as one of its high-priority activities in order to preserve and maintain its affordable housing stock. The housing stock in the ACT Consortium is significantly older than most housing in the country. Based on the analysis of data, the Consortium's need for owner and rental rehabilitation are based on the substandard

condition of rental housing and the older age of both the rental and owner housing stock. Rehabilitation assistance is often critical to ensuring that lower-income people are decently and suitably housed, as the lower and fixed incomes of the elderly and people with disabilities prohibit the installation or repair of needed features. Rehabilitation and maintenance of existing housing continues to be one of the most cost-effective and efficient means of improving affordable living choices, particularly in mature first-ring suburbs such as the ACT Consortium towns.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

To estimate the number of housing units with LBP hazards that are occupied by low or moderate income families, the assumption was made that housing units classified by year built are distributed evenly across all income levels and renter/owner tenure status. As such, household counts in 2010 American Community Survey 5-Year were used to estimate the share of low-income households (0-50% AMI) and moderate-income households (50-80% AMI) in each town.

In Amherst, median household income in 2010 was \$65,439, which means that low-income households (0-50% AMI) earned less than \$32,719 and moderate-income households (50-80% AMI) earned between \$32,719 and \$52,351. Because the ACS splits household income categories, the share of households that fall into each of these categories was approximated and rounded to the nearest range used by the ACS (\$35,000 and \$50,000). The share of low-income households is therefore 13,228 households, or 27% of all households, and moderate-income households total 6,154, or 12.8% of all households.

In Cheektowaga, median household income in 2010 was \$45,893, which means that low-income households (0-50% AMI) earned less than \$22,946 and moderate-income households (50-80% AMI) earned between \$22,946 and \$36,714. These figures were rounded to \$25,000 and \$35,000. The share of low-income households is therefore 8,947, or 23.1% of all households, and moderate-income households total 5,161, or 13.4% of all households.

In Tonawanda, median household income in 2010 was \$47,871, which means that low-income households (0-50% AMI) earned less than \$23,935, and moderate-income households (50-80% AMI) earned between \$23,935 and \$38,296. These figures were rounded to \$25,000 and \$35,000. The share of low-income households is therefore 7,374, or 22.9% of all households, and moderate-income households total 3,964, or 12.3% of all households.

Given the shares and the assumptions stated above, it is estimated that of the 99,699 total housing units at risk for lead-based paint (built before 1980), approximately 24,314 (9,316 in Amherst, 7,932 in Cheektowaga, and 7,066 in Tonawanda) are occupied by low-income

households and approximately 15,279 (6,154 in Amherst, 5,161 in Cheektowaga, and 3,964 in Tonawanda) are occupied by moderate-income households. These figures suggest that 39,593, or approximately 33.2%, of all housing units in the ACT Consortium are units with risk for lead-based paint that are occupied by low or moderate-income households.

However, lead-based paint risk assessments performed for the Consortium's residential rehabilitation programs indicate that the percentage of units at risk for lead-based paint that are occupied by low or moderate-income households is much higher, in the 75% -95% range. Despite this high percentage of such units, the Erie County Department of Health, as previously noted, reports that there are few children with elevated lead blood levels in the suburbs of Buffalo.

## MA-25 Public and Assisted Housing – 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			20						
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 35 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

The only public housing developments within the Consortium are located in the Village of Kenmore. The Kenmore Housing Authority (KHA) has two mid-rise buildings---Kenmore Village Apartments and Theater Apartments---with 100 one-bedroom units for the elderly in each building. KHA's buildings are normally at full occupancy. There are 10 accessible units in each building.

### 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:

As previously stated, the Kenmore Housing Authority (KHA) has a total of 200 units of public housing for elderly residents located in two mid-rise buildings. KHA rates the condition of these units as good. Per HUD's website, the following table contains the most recent (2007) inspection scores for KHA's buildings.



## Public Housing Condition

Public Housing Development	Average Inspection Score
Kenmore Village Apartments	90
Theater Apartments	81

Table 36 - Public Housing Condition

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

The Kenmore Housing Authority (KHA) has used its Capital Fund grants to undertake regular restoration and revitalization activities at its properties. It will continue such activities and capital improvements and modernization efforts. Over the next five years, KHA estimates it will need \$350,000 for restoration and revitalization activities, \$150,000 for capital improvements, and \$150,000 for modernization efforts.

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

As previously noted, all of KHA's 200 units are elderly units. KHA has no family units. KHA updates its Physical Needs Assessment every year to identify needed modernization activities. KHA then undertakes modernization and capital improvements and maintenance activities on its properties as needed.

KHA has reported that the major unmet need of its tenants is adequate parking. Acquiring a site for additional parking is a top priority for KHA, as there are currently not enough parking spaces at either of the KHA properties.

## **MA-30 Homeless Facilities and Services – 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 here 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. However, the Town of Amherst has a three-unit transitional housing facility that is supported by the YWCA, and the Town of Tonawanda has an 89-bed men’s rehabilitation facility at the Salvation Army that is considered a transitional housing facility. Also, in FY 2015, the Town of Tonawanda will receive about \$140,000 of Emergency Solutions Grant (ESG) funds that it will use to assist emergency and youth shelter operations, re-house domestic violence victims and rehabilitate shelters.

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 for the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless, and permanent housing for clients dealing with mental health and/or substance abuse issues.

**Facilities and Housing Targeted to Homeless Households**

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.

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)					
Households with Only Adults					
Chronically Homeless Households					
Veterans					
Unaccompanied Youth					

**Table 37 - Facilities and Housing Targeted to Homeless Households**

**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**

Funding from New York State for homeless facilities and services has been cut by approximately 70% over the last five years, leaving the towns in the ACT Consortium with limited resources. However, there are several mainstream activities targeted towards homeless persons in the area. The Homeless Alliance of Western New York functions as the Continuum of Care for all towns in the Consortium. Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for homeless 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.

**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.**

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.

The Town of Amherst also acts as a public housing authority applicant to acquire housing 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 through 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 tailored to each client. The Town of Amherst is also host to 61 group homes for the developmentally disabled, and the Town of Tonawanda has 29 group homes for people with developmental disabilities.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Various supportive housing needs of the non-homeless have been identified by service providers who were interviewed during the Consolidated Plan process. Identified needs include home repair, weatherization and maintenance for the elderly and frail, accessibility improvements to enable people with disabilities to remain in their homes, housing for the mentally disabled, and affordable housing for all sub-populations.

The Erie-Niagara region has significant refugee populations, many of whom have limited English proficiency (LEP). Stakeholders interviews explained that more and more LEP immigrants are also settling in the Consortium's communities due to family ties and the English as Second Language (ESL) services provided by the schools. These LEP populations are an important part of the special needs population in the Consortium. However, the increase in the LEP population and the need for ESL and other services for the LEP populations are regional issues and not specific to the ACT Consortium communities.

**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**

Supportive housing is defined as living units that provide a planned services component with access to a wide range of services needed for the resident to achieve personal goals. Various populations with special needs require supportive housing. Upon retirement, many lower-income elderly persons will often need subsidized housing that is accessible due to decreased mobility as they age. Frail elderly may need a unit with an extra room for a personal care attendant or may need additional services. Persons with disabilities may need a group home with room for live-in service providers. Persons with HIV/AIDS may need a subsidized housing unit near their health care providers and may need access to treatment for drug addiction (depending on the mode of transmission of HIV/AIDS).

The specific needs of local special needs subpopulations are described in NA-45, Non-Homeless Special Needs Assessment.

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

Pursuant to New York State Department of Health law NYCRR§ 415.3(h) (1), when a resident directly, or through his/her guardian, expresses a desire to leave a Residential Health Care Facility (RHCF), in every instance, the facility must evaluate the resident for discharge to the community. This is accomplished through a Discharge Planner's Checklist, which can be accessed here:

[https://www.health.ny.gov/professionals/patients/discharge\\_planning/discharge\\_checklist.htm](https://www.health.ny.gov/professionals/patients/discharge_planning/discharge_checklist.htm)

Following this evaluation, when placement in a setting other than discharge is determined to be appropriate, it is the provider's responsibility to plan for the safe and orderly discharge of the resident to an appropriate community housing option with the services necessary for community reintegration. For all residents, the discharge planning process must include direct communication with the resident and, as appropriate, families, guardians and legally authorized representatives. RHCF's must adequately prepare and orient residents for such discharges. If the evaluation concludes that the resident is appropriate for nursing home placement, the individual may remain in the RHCF.

The Homeless Alliance of Western New York, which manages the CoC in the ACT Consortium, maintains a rapid re-housing program for their five-county area. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability.

**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)**

Stakeholder interviews with special needs experts revealed that there is an acute need for transitional housing for youth ages 18-24 and permanent supportive housing for special needs populations who may not be homeless but do not have access to the permanent supportive housing they require.

Through the Consortium, housing rehabilitation funds are available specifically for special needs populations in order to assist them with housing repair and accessibility issues. For example, the Town of Tonawanda has an accessibility modification program known as the Freedom Program to assist persons with disabilities with needed accessibility improvements to their homes.

The Consortium also runs public service activities to affirmatively further fair housing for special needs populations, amongst other protected classes. These activities focus on accessibility and mobility issues and ensuring that special needs populations have access to safe and secure affordable housing free from discrimination. Accessibility and mobility is a disproportionate special need in the Consortium because of the large senior population.

The Neighborhood Legal Services Homeless Task Force meets the special needs of the Western New York homeless and near homeless population by providing free legal assistance and referrals to other appropriate services. By traveling to shelters and dining facilities, the Task

Force is able to overcome many of the obstacles homeless people face when attempting to obtain legal assistance. The Consortium plans to help continue to provide supportive services and housing search assistance for persons through coordination with City Mission, Catholic Charities, Family Promise and other non-profits operating in the area.

To strengthen the safety net in communities such as Cheektowaga where residents are struggling, the John R. Oishei Foundation created the Mobile Safety–Net Team Initiative to go into communities in the local area to assess how the effects of the downturn in the economy was impacting residents, help connect residents with the services they need, build relationships with service providers and gather information about human service needs. In Cheektowaga, the Mobile Safety–Net Team has connected the Town’s Offices of Community and Economic Development, Youth & Recreation and Senior Departments with individuals, non-profit organizations, local schools and colleges to help understand and address the needs of the citizens in the Town. Through monthly meetings and sub-committees, the group continues to plan ways to address those needs. From food banks to job training, the group steadily looks to connect and not duplicate services available for Town residents.

The recently expanded Workforce Development Center (Erie 1 BOCES) offers a wide variety of part-time and full-time training programs. Over 3,500 adult students are trained annually at Erie 1 BOCES. The programs provided help adults update skills, prepare for new careers and re-enter the workforce. They also offer High School Equivalency and English as Second Language programs.

**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 – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The following public policy barriers were identified in Erie County's 2009 Analysis of Impediments, which included the ACT Consortium towns. The impediments found in the 2009 document fell into the four areas identified below. Stakeholders interviewed during the consultation process for this Consolidated Plan verified that these barriers still influence the market for affordable housing.

**Zoning:** Local zoning ordinances may present barriers to addressing affordable housing needs. ACT Consortium municipalities have not adopted flexible zoning tools (such as inclusionary zoning or density bonuses) to promote affordable housing development. In addition, modified zoning ordinances are needed to implement smart growth principles that would aid in the development of affordable housing.

Manufactured homes provide affordable housing options for many households. Although ACT Consortium municipalities include provisions for manufactured homes in their zoning ordinances, the ordinances contain restrictions on such homes, including a limited number of zoning districts in which manufactured homes are permitted and/or a small amount of land zoned to permit such homes.

**Lack of supply:** Countywide, there is a limited supply of subsidized rental units targeted to meet the needs of families and low-income households. Most of the county's subsidized rental units are elderly units, and all 200 units of public housing within the ACT Consortium are elderly units. The supply of subsidized housing for families and people with disabilities is severely lacking.

**Unaffordable housing costs:** Median housing values for owner occupied housing are beyond the affordability of many of the ACT Consortium's households. For households with incomes 80% or more below the area's median household income, homeownership is unlikely without government subsidies or the adoption of land use tools such as inclusionary zoning. The high cost of labor and materials and lead-based paint remediation are other potential barriers to the production of affordable housing in the Consortium. This obstacle has proven more intractable in part due to federal Davis-Bacon Act requirements that apply to most housing developments assisted with either CDBG or HOME funds.

**Need for additional affordable housing funding :** Stagnant wages and rising housing costs have increased demand for affordable housing in the region, including in the communities in the ACT Consortium. Cuts in public funding for homeless facilities and subsidized housing have left Erie

County and the ACT Consortium with fewer resources to address continuing and increasing demand.

Erie County and the ACT Consortium are conducting a new Analysis of Impediments to Fair Housing Choice that will be completed in 2015. The new Analysis of Impediments may identify other barriers to affordable housing in the ACT Consortium towns.

## **MA-45 Non-Housing Community Development Assets – 91.215 (f)**

### **Introduction**

In determining priorities for the allocation of federal funds, the ACT Consortium has recognized 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 activities across local and regional agencies.

### **Economic Development Market Analysis**

As of 2010, the ACT Consortium's economic indicators suggest that the area may not be performing as well as the State or the Nation. Unemployment levels are higher than both State and national averages, and only one of the three towns (Amherst) has a higher median household income than the State or the country.

Many residents in the Consortium commute into nearby Buffalo to work, or work in sectors that are in turn dependent on the Buffalo-Niagara regional economy. The Consortium's residents are overwhelmingly employed in the Education and Health Care Industry. Many of these jobs require college degrees, and indeed almost half of all Consortium residents hold at least a Bachelor's degree. This compares to around 30 percent of residents in the County, State, and country. This fact positions residents well to take advantage of the region's jobs. However, the Consortium also has a fairly large number of young working age residents who are unemployed and have only marginal if any employment skills. Over 4,000 workers did not finish high school and do not have a high school diploma or GED. They will be left behind in the region's increasingly advanced and competitive job market.

## Business Activity

The HUD-generated table below summarizes economic data on business activity by sector in the ACT Consortium. HUD’s unique data collection and reporting methods preclude a complete breakdown of this data for each town. .

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	74	133	0	0	0
Arts, Entertainment, Accommodations	4,906	9,154	11	11	-1
Construction	1,170	1,120	3	1	-1
Education and Health Care Services	8,959	15,627	21	18	-2
Finance, Insurance, and Real Estate	4,463	12,937	10	15	5
Information	857	1,230	2	1	-1
Manufacturing	3,524	1,932	8	2	-6
Other Services	1,829	2,921	4	3	-1
Professional, Scientific, Management Services	5,448	12,955	13	15	3
Public Administration	36	23	0	0	0
Retail Trade	5,450	12,062	13	14	2
Transportation and Warehousing	1,008	773	2	1	-1
Wholesale Trade	2,246	3,668	5	4	-1
Total	39,970	74,535	--	--	--

**Table 38 - Business Activity**

**Data Source:** 2006-2010 ACS (Workers), 2010 Longitudinal Employer-Household Dynamics (Jobs)

Two additional tables of employment-related data for the ACT Consortium and its towns are provided. The first table shows the number and share of workers for each Consortium town. Again, different data sources and reporting methods result in discrepancies between the data reported in this table and the HUD-generated table above and preclude a direct comparison of the data in the two tables.

## Employment by Sector

Business by Sector	Amherst		Cheektowaga		Tonawanda	
	Number of Workers	Share of Workers	Number of Workers	Share of Workers	Number of Workers	Share of Workers
Agriculture, Mining, Oil & Gas	41	0%	112	0%	41	0%
Arts, Entertainment,	5,085	9%	3,923	9%	3,919	10%
Construction	1,737	3%	2,019	5%	1,372	4%
Education and Health Care	19,203	33%	9,797	22%	9,874	26%
Finance, Insurance, and Real	5,456	9%	3,333	8%	3,170	8%
Information	1,192	2%	907	2%	904	2%
Manufacturing	4,931	8%	6,022	14%	3,715	10%
Other Services	2,137	4%	1,976	5%	1,765	5%
Professional, Scientific,	7,002	12%	3,644	8%	3,901	10%
Public Administration	2,246	4%	1,877	4%	1,477	4%
Retail Trade	6,402	11%	6,096	14%	4,631	12%
Transportation and Warehousing	1,901	3%	2,060	5%	1,688	5%
Wholesale Trade	1,567	3%	1,885	4%	1,059	3%
<b>Total</b>	<b>58,900</b>	<b>NA</b>	<b>43,651</b>	<b>NA</b>	<b>37,516</b>	<b>NA</b>

Data Source: 2006-2010 ACS (Workers)

In the table above, the figure in the “Number of Workers” column is the number of residents in the town who work in the indicated sector, and the figure in the “Share of Workers” column is the percentage of that town’s workers who are employed in the indicated sector. For example, the number of Amherst residents working in the manufacturing sector (4,931) is 8% of the total number of Amherst residents who are 16 or older and in the civilian work force (58,900).

The table below provides additional employment-related data for the ACT Consortium and its towns. Data discrepancies between this table and the preceding table are due to different data reporting periods, i.e., ACS 2006-2010 and ACS 2012 5-Year Estimates.

## Business by Sector

	ACT Consortium Total		Amherst		Cheektowaga		Tonawanda	
<b>Occupation</b>								
Civilian employed population 16 years and over	141,900	100%	60,178	100%	43,588	100%	38,134	100%
Management, business, science, and arts occupations	57,189	40.30%	31,275	52.00%	12,159	27.90%	13,755	36.10%
Service occupations	23,383	16.48%	8,339	13.90%	8,390	19.20%	6,654	17.40%
Sales and office occupations	40,494	28.54%	14,934	24.80%	13,866	31.80%	11,694	30.70%
Natural resources, construction, and maintenance	7,210	5.08%	1,883	3.10%	2,902	6.70%	2,425	6.40%
Production, transportation, and material moving occupations	13,624	9.60%	3,747	6.20%	6,271	14.40%	3,606	9.50%
<b>Industry</b>								
Civilian employed population 16 years and over	141,900	100%	60,178	100%	43,588	100%	38,134	100%
Agriculture, forestry, fishing and hunting, and mining	306	0.22%	91	0.20%	123	0.30%	92	0.20%
Construction	5,115	3.60%	1,714	2.80%	1,826	4.20%	1,575	4.10%
Manufacturing	13,505	9.52%	4,772	7.90%	5,357	12.30%	3,376	8.90%
Wholesale trade	4,559	3.21%	1,877	3.10%	1,812	4.20%	870	2.30%
Retail trade	17,337	12.22%	6,151	10.20%	6,107	14.00%	5,079	13.30%
Transportation and warehousing, and utilities	5,774	4.07%	1,862	3.10%	2,121	4.90%	1,791	4.70%
Information	2,778	1.96%	1,160	1.90%	836	1.90%	782	2.10%
Finance and insurance, and real estate and rental and leasing	12,008	8.46%	5,199	8.60%	3,277	7.50%	3,532	9.30%
Professional, scientific, and management, and administrative	14,507	10.22%	7,429	12.30%	3,521	8.10%	3,557	9.30%
Educational services, and health care and social assistance	41,566	29.29%	20,609	34.20%	10,608	24.30%	10,349	27.10%
Arts, entertainment, and recreation, and accommodation and	12,509	8.82%	4,893	8.10%	3,812	8.70%	3,804	10.00%
Other services, except public administration	5,782	4.07%	1,966	3.30%	2,109	4.80%	1,707	4.50%
Public administration	6,154	4.34%	2,455	4.10%	2,079	4.80%	1,620	4.20%

Data Source: ACS 2012 5-Year Estimates, DP03



## Labor Force

Total Population in the Civilian Labor Force	62,529
Civilian Employed Population 16 years and over	58,900
Unemployment Rate	5.80
Unemployment Rate for Ages 16-24	15.15
Unemployment Rate for Ages 25-65	3.57

**Table 39 - Labor Force**

Data Source: 2006-2010 ACS

## Labor Force

	ACT Consortium Total	Amherst	Cheektowaga	Tonawanda
Total Population in the Civilian Labor Force	149,320	62,529	46,864	39,927
Civilian Employed Population 16 years and over	140,067	58,900	43,651	37,516
Unemployment Rate	6.20%	5.80%	6.86%	6.04%
Unemployment Rate for Ages 16-24	11.56%	12.58%	11.83%	9.59%
Unemployment Rate for Ages 25-65	5.06%	4.37%	5.93%	5.11%

Data Source: 2006-2010 ACS

Occupations by Sector	Number of People
Management, business and financial	20,036
Farming, fisheries and forestry occupations	2,224
Service	4,577
Sales and office	9,339
Construction, extraction, maintenance and repair	1,894
Production, transportation and material moving	1,639

**Table 40 – Occupations by Sector**

Data Source: 2006-2010 ACS



## Occupation by Sector

	ACT Consortium Total	Amherst	Cheektowaga	Tonawanda
Management, business, science, and arts occupations	56,039	30,378	12,065	13,596
Service occupations	23,087	8,159	8,090	6,838
Sales and office occupations	39,644	14,725	13,576	11,343
Natural resources, construction, and maintenance occupations	7,217	1,958	3,051	2,208
Production, transportation, and material moving occupations	14,080	3,680	6,869	3,531

Data Source: ACS 2006-2010

## Travel Time

Travel time to work is not an issue for residents of the Consortium. Over four out of five (82%) workers travel less than 30 minutes to work each day. This compares to just 53% of New York residents and 65% of Americans. This means that most Consortium residents do not have to travel far to find acceptable employment. Travel times amongst residents of the three towns are relatively consistent.

Travel Time	Number	Percentage
< 30 Minutes	44,332	79%
30-59 Minutes	10,359	19%
60 or More Minutes	1,110	2%
<b>Total</b>	<b>55,801</b>	<b>100%</b>

Table 41 - Travel Time

Data Source: 2006-2010 ACS

## Travel Time

	ACT Consortium Total		Amherst		Cheektowaga		Tonawanda	
	Number	%	Number	%	Number	%	Number	%
< 30 Minutes	110,016	82%	44,332	79%	35,503	85%	30,181	84%
30-59 Minutes	20,527	15%	10,359	19%	5,452	13%	4,716	13%
60 or More Minutes	3,041	2%	1,110	2%	1,035	2%	896	3%
<b>Total</b>	<b>133,584</b>	<b>100%</b>	<b>55,801</b>	<b>100%</b>	<b>41,990</b>	<b>100%</b>	<b>35,793</b>	<b>100%</b>

Data Source: 2006-2010 ACS

## Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	847	50	1,064

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	6,114	504	2,019
Some college or Associate's degree	11,417	552	2,512
Bachelor's degree or higher	27,876	1,006	5,062

**Table 42 - Educational Attainment by Employment Status**

Data Source: 2006-2010 ACS

**Educational Attainment by Employment**

	ACT Consortium Total			Amherst		
	In Labor Force		Not in Labor Force	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed		Civilian Employed	Unemployed	
Less than high school graduate	3,347	686	3,072	847	50	1,064
High school graduate (includes equivalency)	24,576	1,903	7,977	6,114	504	2,019
Some college or Associate's	35,349	1,711	7,325	11,417	552	2,512
Bachelor's degree or higher	47,744	1,621	8,014	27,876	1,006	5,062

Data Source: 2006-2010 ACS

## Educational Attainment by Employment

	Cheektowaga			Tonawanda		
	In Labor Force		Not in Labor Force	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed		Civilian Employed	Unemployed	
Less than high school graduate	1,607	287	1,154	893	349	854
High school graduate (includes equivalency)	11,310	817	3,525	7,152	582	2,433
Some college or Associate's degree	13,448	733	2,545	10,484	426	2,268
Bachelor's degree or higher	8,606	368	1,110	11,262	247	1,842

Data Source: 2006-2010 ACS

## Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	10	80	209	442	943
9th to 12th grade, no diploma	661	292	342	596	1,578
High school graduate, GED, or alternative	3,578	1,412	1,827	5,398	6,616
Some college, no degree	8,347	1,778	2,272	4,412	3,558
Associate's degree	613	1,101	1,474	3,502	1,064
Bachelor's degree	2,500	4,437	4,418	7,613	3,617
Graduate or professional degree	141	3,832	4,299	9,353	3,917

**Table 43 - Educational Attainment by Age**

Data Source: 2006-2010 ACS

## Educational Attainment by Age

	ACT Consortium Total					Amherst				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	81	256	475	1,048	3,599	10	80	209	442	943
9th to 12th grade, no diploma	1,958	1,138	1,203	2,985	6,386	661	292	342	596	1,578
High school graduate, GED, or alternative	8,113	5,316	7,949	21,203	20,282	3,578	1,412	1,827	5,398	6,616
Some college, no degree	14,037	5,624	6,801	13,932	8,470	8,347	1,778	2,272	4,412	3,558
Associate's degree	1,498	3,773	4,555	9,792	2,270	613	1,101	1,474	3,502	1,064
Bachelor's degree	5,019	9,297	8,182	14,310	5,798	2,500	4,437	4,418	7,613	3,617
Graduate or professional degree	373	6,530	6,222	12,873	5,758	141	3,832	4,299	9,353	3,917

Data Source: 2006-2010 ACS

	Cheektowaga					Tonawanda				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	25	95	211	359	2,091	46	81	55	247	565
9th to 12th grade, no diploma	909	423	447	1,513	3,196	388	423	414	876	1,612
High school graduate, GED, or alternative	2,814	2,044	3,804	9,816	7,986	1,721	1,860	2,318	5,989	5,680
Some college, no degree	2,902	2,124	2,865	5,162	2,402	2,788	1,722	1,664	4,358	2,510
Associate's degree	408	1,583	1,916	3,076	531	477	1,089	1,165	3,214	675
Bachelor's degree	966	2,011	1,882	2,897	833	1,553	2,849	1,882	3,800	1,348
Graduate or professional degree	184	1,359	825	1,110	523	48	1,339	1,098	2,410	1,318

Data Source: 2006-2010 ACS

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

**Table 44 – Median Earnings in the Past 12 Months**

Data Source: 2006-2010 ACS

## Educational Attainment-Median Earnings in the Past 12 Months

	ACT Consortium Total	Amherst	Cheektowaga	Tonawanda
Less than high school graduate	NA	\$21,172	\$20,713	\$18,254
High school graduate (includes	NA	\$28,224	\$29,686	\$27,222
Some college or Associate's degree	NA	\$34,563	\$33,475	\$32,102
Bachelor's degree	NA	\$47,664	\$43,913	\$41,820
Graduate or professional degree	NA	\$63,140	\$44,702	\$49,607

Data Source: ACS 2006-2010

## Educational Attainment-Median Earnings in the Past 12 Months –Male and Female

	ACT Consortium Average	Amherst	Cheektowaga	Tonawanda
<b>Total:</b>	38,800	45,845	33,761	36,793
Less than high school graduate	18,110	17,400	20,381	16,549
High school graduate (includes equivalency)	29,268	29,257	29,579	28,969
Some college or associate's degree	34,440	35,093	35,068	33,158
Bachelor's degree	46,730	52,247	42,668	45,274
Graduate or professional degree	54,599	65,944	45,582	52,270
<b>Male:</b>	46,150	55,876	39,614	42,960
Less than high school graduate	20,273	20,217	21,851	18,750
High school graduate (includes equivalency)	35,660	36,146	33,393	37,441
Some college or associate's degree	41,411	44,280	41,437	38,515
Bachelor's degree	54,728	62,457	50,176	51,551
Graduate or professional degree	65,237	81,106	51,281	63,323
<b>Female:</b>	33,154	37,208	30,394	31,860
Less than high school graduate	15,294	16,807	14,880	14,194
High school graduate (includes equivalency)	24,218	23,631	25,495	23,529
Some college or associate's degree	30,051	28,709	30,810	30,634
Bachelor's degree	38,350	40,209	37,225	37,615
Graduate or professional degree	48,491	54,383	42,134	48,957

Data Source: 2008-2012 ACS 5-Year Estimates, B200004

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

The Buffalo Niagara region has largely transitioned into a knowledge-based economy, which has very different business composition than its traditional industrial base. The ACT Consortium's most significant employment sector by far is Education and Health Care Services. This also holds true in each of the three towns. The sector employs the greatest share of workers in the Consortium, employing 33%, 22%, and 26% in Amherst, Cheektowaga, and Tonawanda,

respectively. Retail, Professional Services, and Arts and Entertainment employ the next largest shares of residents in the Consortium, though the order of the next largest three employment sectors varies slightly between the three towns. In Amherst, the next largest shares of residents are employed in Professional Services, Retail, and Arts and Entertainment; In Cheektowaga the next largest sectors are Retail, Manufacturing, and Arts and Entertainment; and in Tonawanda they are Retail, Arts and Entertainment, and Professional Services.

**Describe the workforce and infrastructure needs of the business community:**

According to a report by Erie Community College, 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. The industrial mix found in the ACT Consortium requires maintaining or increasing the number of educated, well-trained and largely professional workforce. As noted above, growth areas for the ACT Consortium include education and health care services, financial services and professional, scientific and management services. The communities also have large retail trade and service industry sectors that are largely lower-wage and unskilled.

Transportation is a major issue in the ACT Consortium. Stakeholder interviews mentioned that many of the low-paying jobs in the Consortium towns are actually held by low-income residents of the City of Buffalo, resulting in significant number of “reverse commuters” traveling from the city into the suburbs. Transportation from affordable housing locations to low-wage jobs is a significant issue for low-income residents in the region, particularly for those residents trying to locate themselves near jobs or other opportunity-creating amenities. Due to the large number of health care jobs, there are a significant number of third-shift or other atypical hours. This population has difficulty using the existing transit system, as it caters to commuters working traditional peak hours. Stakeholders mentioned that Amherst in particular is becoming a local employment center, but transportation infrastructure needed to link affordable housing to these jobs does not yet adequately meet need. Stakeholder interviews revealed that there is little local interest in reverse commuter van programs, and the Metropolitan Planning Organization determined that this type of program would require heavy subsidy.

Methods to overcome the existing job skill gaps were cited by stakeholders as a major need in the region. The most frequently cited employer needs were for skilled labor related to the region’s growing advanced manufacturing industry. Welders, industrial mechanics and machinists were specifically cited by business leaders as being in short supply within the local workforce.

**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 Buffalo Billion Plan encapsulates the major public sector initiative for job and business growth opportunities in the region. The plan is designed to assess future economic drivers and enable their development in the Western New York region. This includes a comprehensive regional market analysis, asset and opportunity analysis, policy needs assessment, and implementation guidelines for the Erie County region.

To help overcome the existing skills gap in advanced manufacturing, the Buffalo Niagara Partnership and the Buffalo Niagara Manufacturing Alliance recently launched the “Dream it. Do it.” WNY Campaign. This initiative teaches middle school and high school students about manufacturing skills and opportunities. The program has reached over 4,000 students, many in the Cheektowaga and Kenmore-Tonawanda School Districts.

One of the major private sector investments in the region is a \$5 billion RiverBend development at former Republic Steel site in South Buffalo. This development is expected to provide 3,000 jobs in next decade.

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

A skillful and well-educated workforce is essential to attracting and retaining employers and growing the ACT Consortium’s economy. As of 2010, the Consortium’s unemployment rate was 6.2%, higher than both the State and the nation’s unemployment rates of 4.8% and 5.1%, respectively. As expected, residents with a Bachelor’s degree or higher were less likely to be unemployed or not in the labor force than residents with less educational attainment. Residents without a high school diploma or equivalent were split almost evenly between being employed or being out of the labor force altogether. Taken together, these facts suggest that the skills and education of the Consortium’s workforce may not be well aligned with employment opportunities in the area.

Unemployment rates are generally higher for young people (16-24) than they are for working-age adults (25-65), but it is interesting to note that the difference in unemployment rates varies between the towns. Amherst, for example, has the lowest unemployment rate for working adults, but the highest for young people. Tonawanda, on the other hand, has a smaller difference between the unemployment rates of the two groups.

Stakeholders cited a significant mismatch between skills and employment opportunities. The advanced manufacturing and industrial development sectors have grown significantly in the region, but the local labor workforce lacks enough skilled laborers to meet the new demands of these emerging sectors. Advanced technical and vocational skills are in the shortest supply.

**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. While these centers are in Buffalo and Orchard Park, they are accessible for residents of all the communities in the Consortium. These efforts aim to reduce the skills gap described by both stakeholders and the HUD data in order to fill jobs and reduce the disparity in education within the Consortium.

Catholic Charities, one of the largest social service providers in the Consortium, is starting workforce and employment training. This will be incorporated into its existing social services.

The Erie County Board of Cooperative Educational Services (BOCES) provides a wide range of training and career programs to high school students and adults.

The recently expanded Workforce Development Center (Erie 1 BOCES) offers a wide variety of part-time and full-time training programs. Over 3,500 adult students are trained annually at Erie 1 BOCES. The programs provided help adults update skills, prepare for new careers and re-enter the workforce. They also offer High School Equivalency and ESL programs.

Erie Community College is engaged in a comprehensive workforce training initiative designed to pair with the *Buffalo Billion* plan and the One Region Forward plan. ECC works diligently to maintain an alignment between the college's academic and workforce development programs and the workforce needs of the region's business and industry. The college maintains open lines of communication with industry leaders to determine employers' needs regarding types of workers and worker skills. A good example of this is the Machining/Manufacturing Alliance (MMA) between ECC and machining and manufacturing companies in Western New York.



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

Yes. The Erie County Industrial Development Agency (ECIDA) finalized a Comprehensive Economic Development Strategy (CEDS) in July 2011. The CEDS encompasses all of Erie County, including the ACT Consortium. While the goals and strategies are for Erie County as a region, the ACT Consortium is considered and included in the CEDS.

The Consortium has been an active participant in the One Region Forward sustainable economic development plan. This plan puts forth a comprehensive economic development strategy for Erie County and Niagara County. Key goals in the plan center around improving mobility, promoting more efficient land use patterns, strengthening basic infrastructure, growing a 21st century economy, ensuring broad access to healthy food, protecting housing and neighborhoods, and mounting the region’s response to the challenge of global climate change. Economic development strategies compose a large part of the One Region Forward plan.

**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.**

The Consortium is a participant in the Sustainable Community Grant program, which is a major funding source for the One Region Forward initiative. This plan has a high level of synergy with the CEDS in terms of fostering the following industrial sectors:

- Agriculture/Agribusiness
- Logistics/Distribution
- Back Office/Call Centers/Professional Services
- Advanced Manufacturing
- Life Sciences
- Regional/Cultural Tourism

In addition, each ACT Consortium town has a comprehensive plan that connects economic development initiatives with the needs and strategic plan outlined in this Consolidated Plan.

The Amherst 2011 Comprehensive Plan has an outline for future economic development needs and policy. Needs outlined are strategic planning to address the skills gap to ensure fast-

growing industry sectors can fill their positions with local demand and nurturing hi-growth industries in the region with substantial local benefit, such as the education and technology sectors. The plan's primary economic development goals are to establish a collaborative planning structure with the University of Buffalo to address issues such as business/employment growth, land use planning, and social/cultural ties. The town also aims to pursue collaborations with educational institutions, private businesses, and other partners to promote economic development in Amherst.

The Town of Cheektowaga's Comprehensive Plan, completed in 2010, provides a plan for Cheektowaga stretching into 2029. This plan identifies Cheektowaga's transportation infrastructure and its surplus of large, vacant retail spaces along some of the town's arterial roads, many of which are ripe for redevelopment with alternative uses, as key economic assets. Cheektowaga also aims to coordinate economic development issues with the county, state and federal agencies and devise a regional approach to these issues. Economic initiatives at the local level include revising land use and zoning ordinances, improving regional transportation infrastructure, neighborhood rebranding, and enhanced efforts at regional coordination.

The Town of Tonawanda's Comprehensive Plan was first drafted in 2005 and revised in 2014. Since 2005, several action items have been completed related to specific study areas, such as rezoning Old Towne and Delaware Avenue, a Local Waterfront Revitalization Program update, a brownfields revitalization plan within the newly created Tonawanda Brownfield Opportunity Area, the creation of the Youth, Parks & Recreation Comprehensive Plan, and a Waterfront Land Use Plan Update. Other economic development-related initiatives include zoning studies for solar power installations, adult uses, and various commercial corridors. These area-wide studies are being integrated into an overall vision for the town to help guide decision-making. The 2014 update will encompass the other planning studies that have been completed since 2005, rolling those efforts into one authoritative guide.

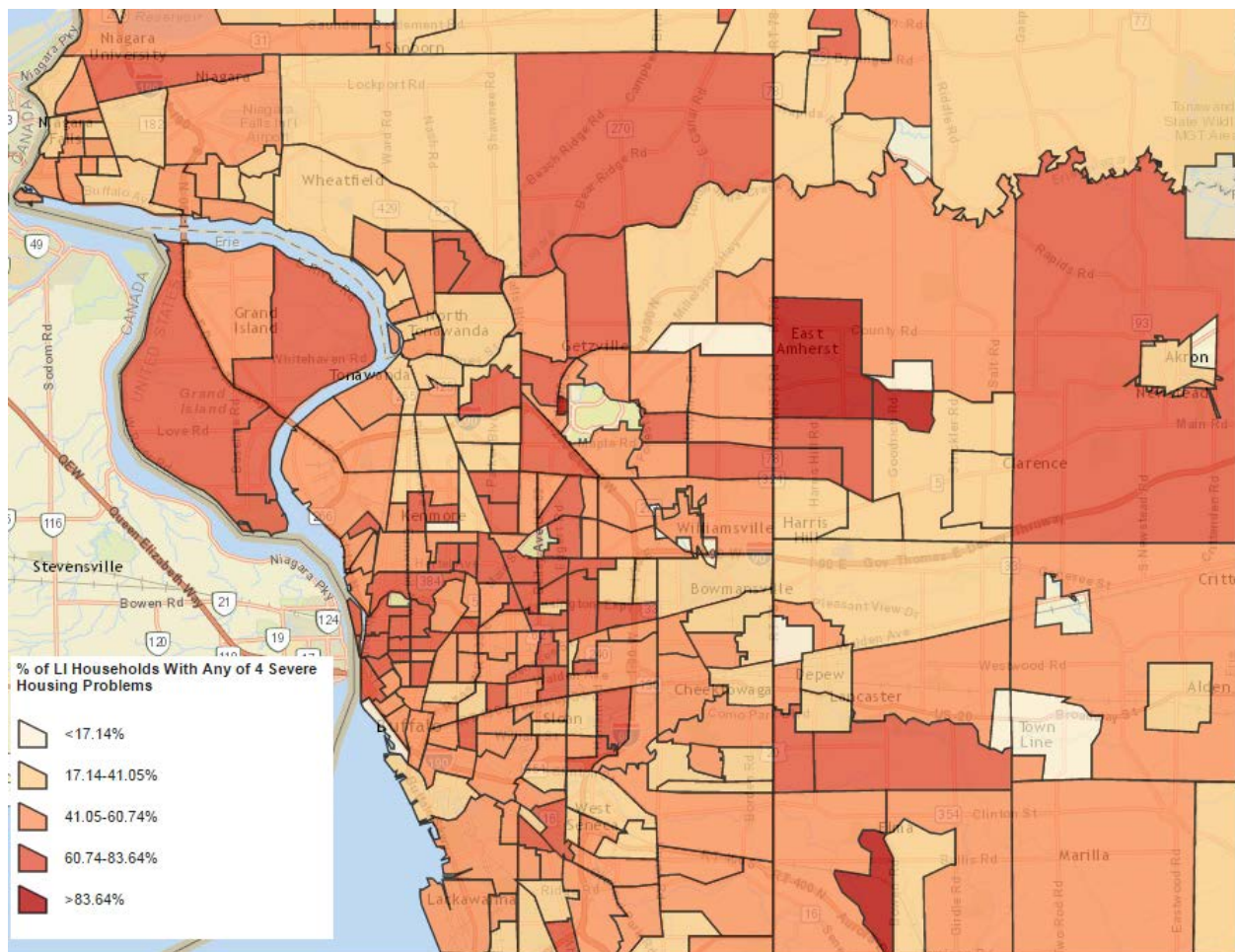
## **Discussion**

As discussed above, the ACT Consortium has a significant number of young workers with minimal education and job skills. The One Region Forward and the Erie County CEDS initiatives are seeking to target workforce development activities that have high levels of synergy with the Erie-Niagara Workforce Investment Board's initiatives, including CDBG-funded adult basic education programs. This will help these young workers improve their employment options in the Erie-Niagara region's increasingly advanced and competitive economy.

## MA-50 Needs and Market Analysis Discussion

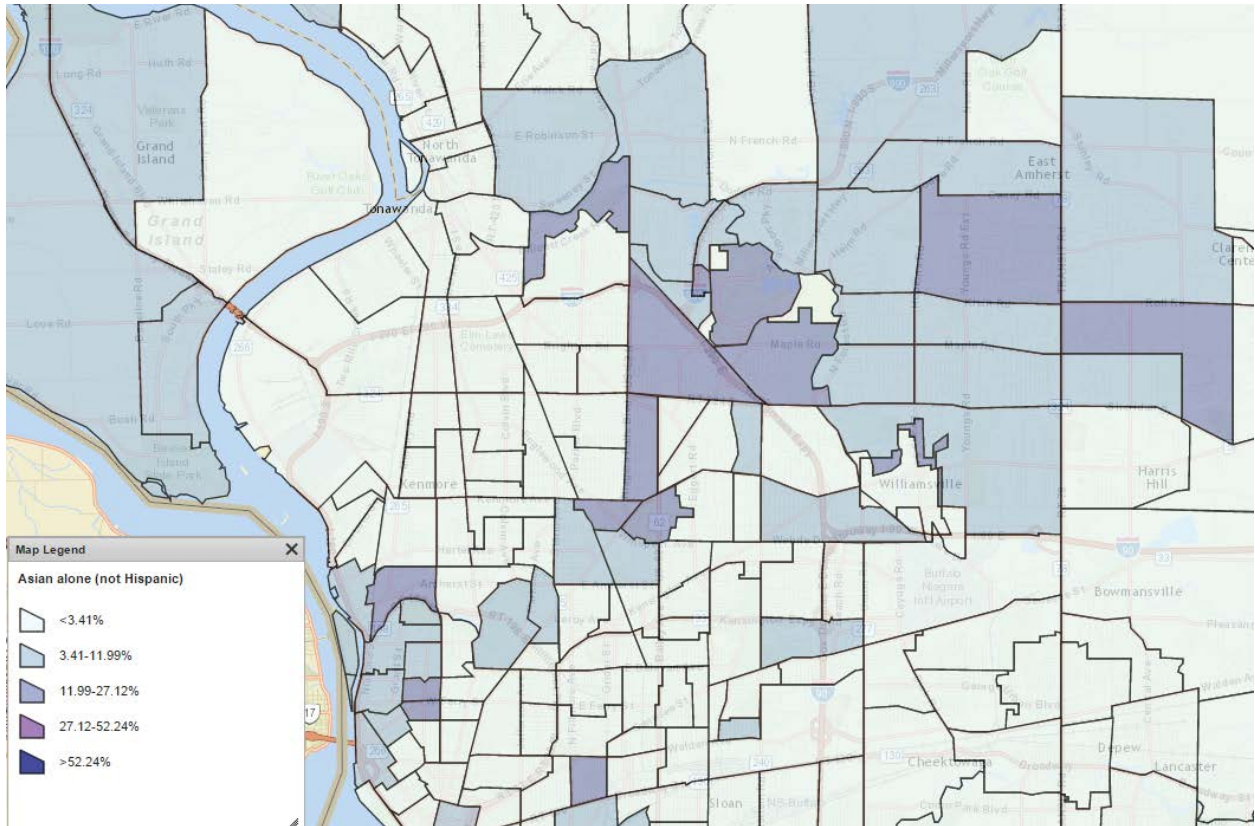
**Are there areas where households with multiple housing problems are concentrated?  
(include a definition of "concentration")**

For the map below, HUD CPD data was used to display the percentage of low-income households experiencing one or more housing problems. Several small areas of concentration were identified. "Concentration" is defined as having a value within the top two quintiles of the distribution, which in this case is a value over 60.74%. Within the Consortium area, the highest concentrations of housing problems are generally found in the tracts adjacent to SUNY Buffalo North's campus and in some the tracts in Cheektowaga and Tonawanda that border the City of Buffalo. However, these areas are generally not clustered into a continuous area of concentrated housing problems. (Please note that the dark area on the map labeled East Amherst is not located in the Town of Amherst. It is located in the Town of Clarence, and therefore is outside the ACT Consortium area.)

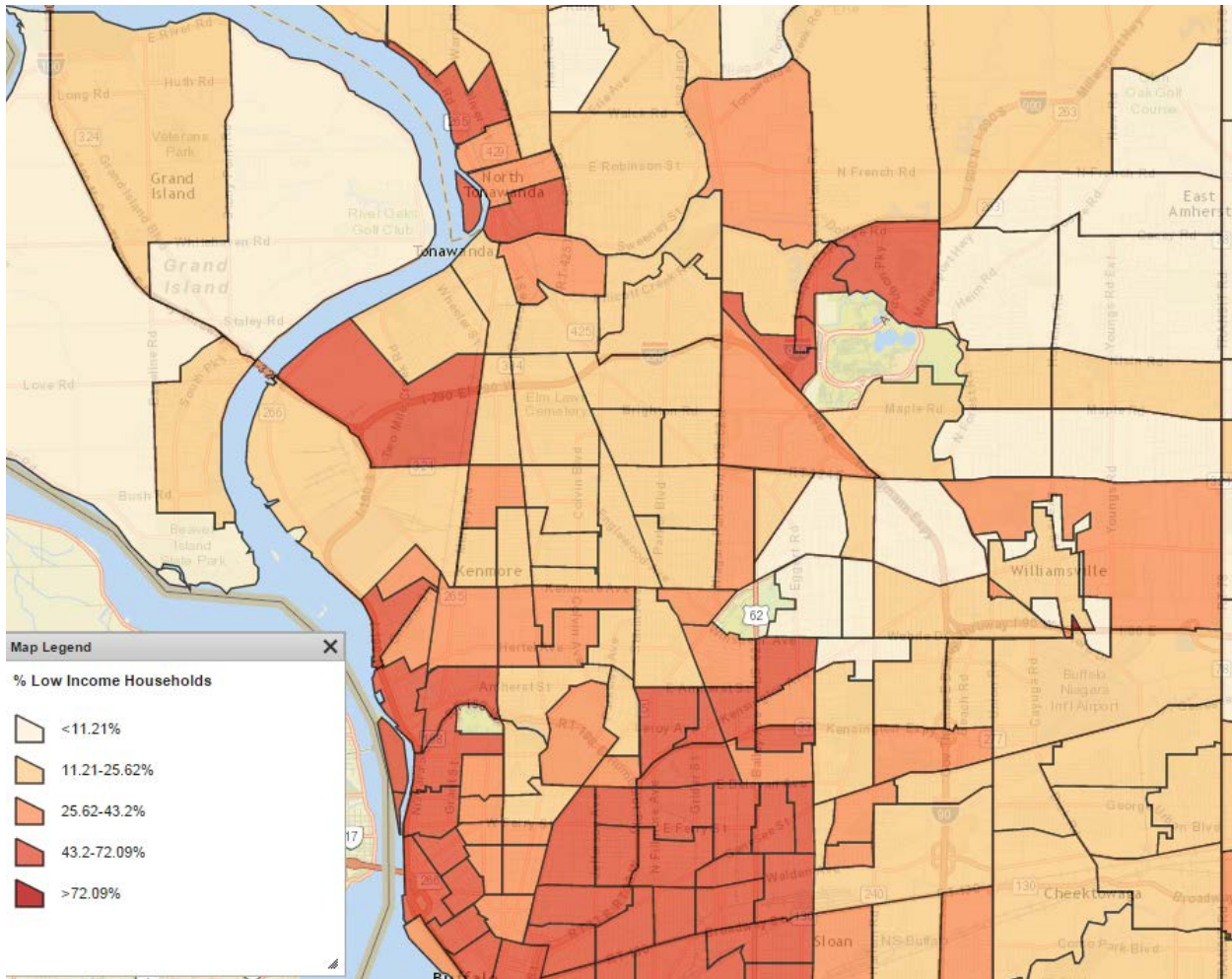


**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

All the communities in the ACT Consortium are predominantly White. Defining “concentration” as meaning having areas within the top two quintiles of the percentage distribution, the ACT Consortium has a high concentration of Asian residents. These concentrations are found within Amherst and Tonawanda. The map below shows the percentage of Asian residents by Census tract:



Using the same definition of concentration, an area of low-income households can be found in Amherst, adjacent to the SUNY Buffalo North campus. This is likely caused by the high percentage of students living near the university. Other than this cluster, there are no other areas of low-income concentration within the ACT Consortium. The map below shows the percentage of low-income residents by Census tract:



**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 areas of Asian concentration are largely within Amherst. The Census tracts with high Asian concentrations are largely stable and representative of the general market conditions in the ACT Consortium. The areas primarily encompass traditional single-family neighborhoods in close proximity to major commuter roads and highways.

**Are there any community assets in these areas/neighborhoods?**

Yes. As mature first-tier suburbs, 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. Consequently, the towns will continue to use their owner-occupied housing rehabilitation programs as the principal vehicle to assist homeowners. Each Consortium town operates its own loan program with CDBG and HOME funds, and each maintains a substantial waiting list. A majority of homes assisted through the program will undergo the removal of at least some lead paint hazards. Amherst and Cheektowaga will also use funds from the NYS Affordable Housing Corporation to fund these activities and to provide the required local match for HOME funds. In addition to eligible corrective work, access improvements, such as wheelchair ramps and doorway modifications, are also eligible work items for physically disabled persons in low- and moderate-income households.

### Geographic Priorities

In Amherst, the focus will be on eligible portions of Eggertsville and Creek Woods; in Cheektowaga, activities will be focused in Walden Avenue/Pine Hill and Cedargrove Heights; and in Tonawanda, the focus will be on the Sheridan-Parkside, Old Town and Kenilworth neighborhoods. In general, Consortium owner-occupied housing rehabilitation activities will be focused in each towns' older neighborhoods, where infrastructure improvements will also be undertaken with CDBG funds.

### Priority Needs

In Amherst, priority needs include:

- Affordable Housing
- Affordable Housing for the Elderly
- Emergency Shelter

- Infrastructure
- Public Facilities
- Public Services
- Economic Development
- Historic Preservation

In Cheektowaga, priority needs include:

- Residential Rehabilitation - Single Family Owner-Occupied
- Residential Rehabilitation – Multi-Family Owner-Occupied & Rental
- Residential Rehabilitation – Owner-Occupied & Rental-Occupied Emergency Loan Program
- Residential Rehabilitation – Owner-Occupied & Rental-Occupied Weatherization Program
- Residential Rehabilitation – Owner-Occupied Sump-Pump Grant Program
- Financial assistance to disabled persons
- Financial assistance to secure affordable housing
- Code Enforcement
- Housing Counseling
- Neighborhood Revitalization – Acquisition, Demolition, & Disposition
- Public Services – Summer Day Camp & Employment Services
- Public Services – Senior Services and Transportation
- Public Services – Domestic Violence Counseling
- Public Services – Youth Services, Food Pantry, Jobs Training & Crime Awareness
- Public Infrastructure & Improvements
- Public Facilities
- Assistance to homeless persons
- Economic Development - Rehabilitation, Direct Assistance, Technical Assistance & Micro-Enterprise Assistance



In Tonawanda, priority needs include:

- Residential Rehabilitation – Owner-Occupied
- Residential Rehabilitation - Rental
- Neighborhood Revitalization – Acquisition & Demolition
- Housing Counseling
- Weatherization assistance
- Code Enforcement
- Public Infrastructure
- Assistance to disabled persons
- Assistance to secure affordable housing
- Public Facilities
- Assistance to homeless persons
- Economic Development
- Public Services – Youth Services, Crime Awareness

### **Influence of Market Conditions**

This plan identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ultimately, the Consortium is working to ensure that a mix of housing types exists within each community to accommodate households of all types and income levels. The Consortium’s housing strategies will be especially guided by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options.

### **Anticipated Resources**

This Strategic Plan estimates the resources that will be available to address the Consortium's priority needs. The level of resources available will play a key role in the strategies and goals described in the plan.

### **Institutional Delivery Structure**

The ACT Consortium relies on a network of public, private sector, and non-profit organizations to implement the Strategic Plan, particularly to address homelessness and special needs populations.

## **Public Institutions**

### **Town of Tonawanda Youth, Parks & Recreation Department**

The Town of Tonawanda Department of Youth, Parks and Recreation is responsible for providing quality facilities, grounds, programs and leisure and family enrichment services to all residents of the Town of Tonawanda and Village of Kenmore. The Town's Youth, Parks & Recreation Department provides an after-school youth program in the Sheridan Parkside Community Building. The Department has established a network of youth development and family enrichment programs and services that enable youth to acquire assets to become productive, functional and fully integrated members of the community.

### **Amherst Youth Department**

The Amherst Youth Department will utilize CDBG funds to contract with Catholic Charities for family service counseling and with the Boys and Girls Club to provide an after-school program at the Eggertsville Community Center. The Amherst Youth Board is an organization offering varied services in support of children, youth and families living in the Town of Amherst. Chartered by the Amherst Town Board and New York State Executive Law, the agency is governed by a policy-making board of 23 citizen volunteers, comprising both adults and youth.

### **Town of Amherst Planning Department**

The Amherst Planning Department has four primary responsibilities: development plan review; long-range planning; community development and housing program administration; and program implementation. The Department organizes and undertakes technical reviews of subdivisions, site plans, rezoning requests and other approvals, and provides recommendations for Planning Board action, including draft action resolutions. The Department has review and approval authority for minor site plans, minor site plan adjustments, sidewalk waivers and coordinated sign plans. Additionally, it ensures Town compliance with the State Environmental Quality Review Act (SEQR) for approval actions by the Planning Board, Zoning Board of Appeals, Town Board and related town agencies and departments. The Department also provides technical support for the Preservation Commission, Nature View Park Advisory Committee, Town-wide Drainage Committee, Conservation Advisory Council and Traffic-Safety Board.

### **Town of Cheektowaga Office of Economic and Community Development and the Town of Tonawanda Office of Community Development**

Using resources from their respective towns' Community Development Block Grants, and federal HOME Investment Partnerships Program funds, these offices develop programs to prevent or reverse the deterioration of low-income neighborhoods and low-income owner and renter housing.

The Cheektowaga Office of Economic and Community Development administers Community Development Block Grant funds provided to the Town by the United States Department of Housing and

Urban Development (HUD). The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods and economic opportunities.

The Town of Tonawanda Office of Community Development helps improve the quality of Tonawanda's neighborhoods through best practices in urban planning and the effective administration of U.S. Housing and Urban Development (HUD) programs. Tonawanda uses HOME funding for First-Time Homebuyer New Build Programs, Closing Cost Assistance Programs, and for the Residential Rehabilitation Program.

### **The Village of Kenmore Office of Community Development**

The Town of Tonawanda will enter into contract with the Village of Kenmore to provide Community Development Block Grant funds for programs that will prevent or reverse the deterioration of low income neighborhoods and low income owner and renter housing.

### **Private Industry**

The primary role of private industry in Consortium activities is as contractors in the housing rehabilitation and community projects carried out annually with CDBG and HOME funds.

### **Public Agencies**

#### **Erie County PHA Consortium**

The Erie County Public Housing Agency Consortium is comprised of 42 municipalities in Erie County outside the City of Buffalo. Although it was organized by the Erie County Division of Planning for the sole purpose of making the Section 8 rent subsidy program accessible to County residents, the County does not participate as a member PHA. The Town of Amherst has contracted with other member PHAs of the Consortium to act as the lead PHA for the purpose of submitting grant applications and entering into contracts with HUD on behalf of the Consortium. The Town of Amherst also contracts with Belmont Housing Resources for WNY on behalf of the Consortium to act as its management agent.

The PHA Consortium does not have a board of commissioners or any paid staff. Member municipalities that are entitlement communities under the Community Development Block Grant program have a seat on the Consortium's Steering Committee. The Erie County Department of Environment and Planning, which administers the CDBG program for the Erie County Community Development Block Grant Consortium also has a seat on the Steering Committee as a representative of the CDBG Consortium municipalities.

#### **New York State Office of Mental Retardation and Developmental Disabilities**

NYS OMRDD funds the acquisition of suitable housing and its rehabilitation in order to function as community residences in a neighborhood setting for adults with developmental disabilities. Under New York State Mental Health law, these residences are treated as single family homes. West Seneca Developmental Center is utilizing this funding to establish residences throughout the Consortium towns. The Consortium towns have contracted with West Seneca

Developmental Center to utilize the funding provided for these residences as a match for its HOME program.

## **NONPROFIT ORGANIZATIONS**

### **Supportive Services, Inc.**

The Consortium Towns will contract individually with Supportive Services, Inc. to provide weatherization services for owner and renter units occupied by low income households. The weatherization work is funded by the New York State Department of State through the Weatherization Program.

### **Belmont Housing Resources of Western New York**

The Town of Amherst, as the lead PHA for the Erie County Public Housing Agency Consortium, contracts with Belmont Housing Resources of WNY to administer the Section 8 Existing Housing Program. Low income persons are thus able to receive Section 8 certificates and vouchers through Belmont.

Also, Belmont Housing Resources of WNY administers a Section 8 Project Based Program in the Consortium Towns. Through Belmont Housing Resources of WNY the PHA Consortium and the Buffalo Veterans Administration Hospital have received funding to assist disabled homeless veterans. Belmont Housing Resources of WNY will administer the Section 8 rental assistance, and the Veterans Hospital will administer the service component for this program. The Consortium Towns will contract individually with Belmont Housing Resources of WNY to provide comprehensive housing counseling services to owner and renter low-income households and first-time homebuyers.

### **Catholic Charities**

Catholic Charities will administer a Family Service Counseling program to assist at-risk low and moderate income youth in the Town of Amherst.

### **Emergency Shelter/Service Providers**

Emergency shelter/service providers serve the special needs populations of homeless youth, runaway youth and battered women with children.

### **Supportive Housing for the Elderly Section 8 New Construction Program**

### **HOPE/Enriched Housing Program for the Elderly**

The Consortium Towns will continue to support non-profit agencies that apply to the Department of Housing and Urban Development for funds under the Supportive Housing for the Elderly Program or the Section 8 New Construction Program for the Elderly and the New York State financed HOPE/Enriched Housing Program for the Elderly.

### **PRIVATE INDUSTRY**

As developers, owners, managers and lenders, the private sector has extensive experience and involvement with housing programs. Private industry, for example, rehabilitated 45 units in the Princeton Apartments in Amherst and over 350 rental units for low income households in the Parkside Village Courts neighborhood of Tonawanda under the New York State Rental Rehabilitation Program.

The Consortium towns operate housing rehabilitation loan programs with CDBG and HOME funds to provide interest free, deferred loans to low and moderate income homeowners. Homeowners, in turn, utilize private contractors to undertake necessary rehabilitation work.

The federal Low Income Housing Tax Credit Program allows investors to take a portion of the cost of rehabilitating low income housing units as a credit against federal taxes over a 10 year period. These tax credits are also available for new construction.

In the future, the Consortium Towns will look to establish a public/private partnership to achieve similar results in other qualified parts of the Consortium.

## Town of Amherst Goals

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
1	Improve Housing Stock	Maintain and Improve Housing Stock Safe, secure and affordable rental housing	Homeowner Housing Rehabilitated: 30 Household Housing Unit
2	Promote Affordable Homeownership	Promote Affordable Homeownership	Direct Financial Assistance to Homebuyers: 4 Households Assisted)
3	Provide Assistance to Homeless Population	Promote Safe, secure and affordable rental housing Suitable Environment and Service Provision.	Overnight/Emergency Shelter/Transitional Housing Beds added: 4 Beds
4	Special Needs Population	Safe, secure and affordable rental housing Suitable Environment and Service Provision l/m	Public service activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted
5	Rental Housing Owner-occupied Rehabilitation	Maintain and Improve Housing Stock Safe, secure and affordable rental housing	Rental units rehabilitated: 0 Household Housing Unit
6	Weatherization Assistance	Maintain and Improve Housing Stock	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Rehabilitated: 24 Household Housing Unit

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
7	Affirmatively Further Fair Housing	Accessibility and Mobility Promote Affordable Homeownership Safe, secure and affordable rental housing Suitable Environment and Service Provision I/m Housing and Employment free from Discrimination	Public service activities for Low/Moderate Income Housing Benefit: 70 Households Assisted
8	Historic Preservation/ /Elimination of Slum and Blight	Suitable Environment and Service Provision I/m	Facade treatment/business building rehabilitation: 1 Business
9	Community Services	Suitable Environment and Service Provision I/m	3,520 persons served

### Town of Cheektowaga Goals

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
1	Residential Rehabilitation- Owner-Occupied	Owner-Occupied Rehabilitation	180 Units 20 Units
2	Residential Rehabilitation – Rental	Rental Rehabilitation	25 Units
3	Residential Rehabilitation- Emergency Program	Owner-Occupied Special Rehabilitation	50 Units
4	Provide Weatherization Assistance	Sustainable Housing	65 Units
5	Provide Sump Pump Assistance	Sustainable Housing	50 Units
6	Provide assistance to the disabled	Accessible Housing	5 Units

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
7	Provide assistance to secure affordable housing	Affordable Housing	20 Households Assisted
8	Code Enforcement	Sustainable Housing	2,900 People (LMA)
9	Housing Counseling	Housing Counseling	400 Households Assisted
10	Acquisition Demolition Disposition	Acquisition Demolition Disposition	2 Substandard Units
11	Public Services – Summer Day Camp & Employment Services	Public Services	300 People Assisted (LMI)
12	Public Services – Senior Services & Transportation	Public Services	7,500 People Assisted (LMC LmtdClient'l) 1 van purchased
13	Public Services –Domestic Violence	Public Services	500 People Assisted (LMC)
14	Public Services	Public Services	20,000 People Assisted (LMA)
15	Public Infrastructure	Public Infrastructure	2,100 People Assisted (LMA)
16	Public Facilities	Public Facilities	2,100 People Assisted (LMA)
17	Provide assistance to the homeless	Homeless Assistance	10 Individuals or Families
18	Economic Development	Economic Development	5 Businesses Assisted 25 LMJ Jobs Created/Retained



## Town of Tonawanda Goals

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
1	Residential Rehabilitation- Owner-Occupied	Owner-Occupied Rehabilitation	100 Units
2	Public Infrastructure	Public Infrastructure	2,500 People Assisted (LMA)
3	Acquisition  Demolition	Acquisition  Demolition	10 Substandard Units
4	Public Services	Public Services	2,500 People Assisted (LMA)
5	Housing Counseling	Housing Counseling	200 Households Assisted
6	Residential Rehabilitation – Rental	Rental Rehabilitation	15 Units
7	Provide assistance to the disabled	Accessible Housing	5 Units
8	Provide assistance to secure affordable housing	Affordable Housing	25 Households Assisted
9	Public Facilities	Public Facilities	2,500 People Assisted (LMA)
10	Provide weatherization assistance	Sustainable Housing	200 Units
11	Code Enforcement	Sustainable Housing	2,500 People (LMA)
12	Provide assistance to the homeless	Homeless Assistance	60 Individuals or Families
13	Economic Development	Economic Development	20 Businesses Assisted

## **Public Housing**

The Towns of Amherst and Cheektowaga do not have public housing authorities. Within the Town of Tonawanda, the Kenmore Housing Authority (KHA) has 200 units of elderly public housing located in two mid-rise buildings with 100 units, including ten handicap-accessible units, in each building.

KHA buildings are normally at full occupancy. There are no current tenants who need to be transferred to an accessible unit. A total of 5% of KHA tenants qualify as extremely low-income (earning less than 30% of the area median household income, or MHI), 4% qualify as very low-income (earning between 30% and 50% of MHI), and 89% qualify as low-income (earning between 51% and 80% of MHI). Residents pay 30% of their income for rent. HUD annually allocates funds to cover the costs for operation and maintenance of the buildings.

There are 473 applicants on the Kenmore Housing Authority waiting list, including 205 applicants who qualify as handicapped. The KHA has adopted a local preference ruling which gives Village of Kenmore residents first priority for housing; Town of Tonawanda residents receive second priority and all other applicants are placed on a third waiting list.

Over the last several years, the KHA has had a housing turnover rate of 14 percent, or about 28 units per year. This is a relatively high turnover rate compared with earlier years and is due, in part, to the increased average age of tenants at the time of admission. The result has been a lower average time in residence as these older tenants age in place and can no longer live independently in an apartment. This translates into an increased workload not only for the administrative staff handling and processing new dwelling leases, but also for maintenance staff who need to prepare the units for new occupancy.

## **Barriers to Affordable Housing**

The Consortium towns have identified some negative effects of local public policies impacting on the availability of affordable housing. Local zoning ordinances may present barriers to addressing affordable housing needs. ACT Consortium municipalities have not yet adopted flexible zoning tools (such as inclusionary zoning or density bonuses) to promote affordable housing development. The Towns will review zoning ordinances to identify policies that will remove inappropriate barriers to affordable housing.

In addition, proponents of affordable housing are increasingly confronted today with opposition that develops primarily due to a false perception of a specific population to be housed and a general ignorance of the implications of not providing such housing. This public

misperception has dangerously crystallized into the phenomenon known as "NIMBYism" ("Not In My Back Yard") where residents rally against almost any type of development they perceive as inappropriate.

There are generally two courses of action to take to mitigate this barrier to a manageable level. A strategy that recognizes that both the developer/proposer and the recipient community have a responsibility in mitigating this barrier can establish a basis for positive results. It is essential that all parties concerned, including local review boards and affected residents, be sufficiently educated and informed regarding the importance and necessity of housing for special needs populations and the benefits that may accrue to the neighborhood and the community as a whole. Misconceptions and lack of accurate information may jeopardize a worthwhile project and prevent a need from being met. The proposer has an obligation to ensure that any such misconceptions be dispelled by providing accurate information about each project.

### **Homelessness Strategy**

Low-income families and individuals who are in imminent danger of being unsheltered because they lack access to permanent housing and/or they lack an adequate support network will be directed to the Belmont Housing Resources for WNY for counseling in an attempt to prevent homelessness. Belmont Housing administers the Section 8 rent certificate program in Erie County, including the ACT Consortium communities, and provides a variety of counseling services to prevent homelessness. The Section 8 Certificate and Voucher programs will provide assistance to homeless persons to secure permanent affordable housing. Additionally, vacancies of units under the Section 8 Moderate Rehabilitation and Section 8 Project Based Assistance Programs will offer permanent affordable housing to homeless persons.

The ACT Consortium members have established contacts with the Homeless Alliance of Western New York. Should the need arise, the individual Consortium members are able to refer citizens to the resources available through this agency.

## **SP-10 Geographic Priorities – 91.215 (a)(1)**

### **Geographic Area**

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.

### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

### **Town of Amherst Geographic Priorities**

In 2018, the Town of Amherst will celebrate its bicentennial anniversary. Over the past two centuries, Amherst has grown from a historical pattern of small settlements surrounded by farmland to a “bedroom” suburb of Buffalo to its present status as a premier residential community and activity/employment center in Western New York.

In recent years, Amherst has undergone a fundamental transition from a growing community to one that is mature and largely built out. The primary challenge for Amherst is to maintain and enhance the established character and quality of life of the community.

Most of Amherst’s neighborhoods are in good shape, with isolated pockets of housing in need of repair. In the southern portion of the Town containing the Snyder, Eggertsville, and Williamsville neighborhoods, approximately 75% of the housing is over 40 years old. These neighborhoods will require housing rehabilitation assistance.

In Amherst, the focus will be on providing housing rehabilitation funding to income-eligible applicants in portions of Eggertsville and town-wide, as needed.

### **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.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

The following table shows priority needs within the Town of Amherst and Village of Williamsville. Priority needs were included based on the results of public input, stakeholder meetings and interviews, and discussions with community development staff members.

### Priority Needs Summary

1	<b>Priority Need Name</b>	Residential Rehabilitation – Owner-Occupied
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Town-Wide
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	Improving the housing stock continues to be a high priority.
2	<b>Priority Need Name</b>	Residential Rehabilitation – Owner-Occupied Military Grant
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Town-Wide

	<b>Description</b>	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.
<b>3</b>	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Public Services – Youth Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Description</b>	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 indentified through the schools and after school programs in the Town.
<b>4</b>	<b>Basis for Relative Priority</b>	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. The Town has a higher number of single parents in some of the target neighborhoods where these services are available.
	<b>Priority Need Name</b>	Housing Counseling and Foreclosure Prevention Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely low, low, moderate
	<b>Description</b>	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 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 risk of mortgage default or foreclosure.

5	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Residential Rehabilitation – Owner occupied Rental
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	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.
6	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Handicapped Accessibility
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Extremely Low Low Moderate Persons with Disabilities
	<b>Description</b>	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.
7	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Homebuyer Assistance for Affordable Housing
	<b>Priority Level</b>	Low



	<b>Population</b>	Extremely Low Low Moderate Large Families Persons with Disabilities
	<b>Description</b>	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.
8	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Public Facilities
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	The Town and Village have several public facilities that were built prior to 1930 and may need some renovation especially for accessibility. CDBG funds may be used for these renovations. The Village has identified some facilities with Landmark status that will be covered under Historic Preservation.
9	<b>Basis for Relative Priority</b>	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.
	<b>Priority Need Name</b>	Weatherization Assistance
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	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. The Town supports this effort with a \$200 administration fee per unit.
	<b>Basis for Relative Priority</b>	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.

10	<b>Priority Need Name</b>	Code Enforcement
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	The Town and Village will provide NYS Code Enforcement Officers in low-moderate income neighborhoods to identify and correct housing code violations in order to sustain a decent living condition for all those in the neighborhood.
	<b>Basis for Relative Priority</b>	The Town and Village have approximately 23,000 housing units of which 80% were built prior to 1960. Many homeowners have deferred maintenance to the point of becoming neighborhood “eyesores” and local residents have identified cleaning up these properties as a priority in maintaining a decent living condition.
11	<b>Priority Need Name</b>	Community Policing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	A Community Policing Program of foot and bicycle patrols in target neighborhoods offers residents an opportunity to interact with police officers through neighborhood watch programs and neighborhood parks and provides a higher sense of security and quality of life in at risk neighborhoods.
	<b>Basis for Relative Priority</b>	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.
12	<b>Priority Need Name</b>	Assistance to Victims of Domestic Violence
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	The Town has welcomed a new facility that houses counselors and representatives of various County and State services that assist persons and families escaping domestic violence. The building is an older structure and has need of accessibility improvements.

	<b>Basis for Relative Priority</b>	There has been a great need identified for a facility in the North towns that offers a secure environment for services to accommodate those escaping domestic violence.
<b>13</b>	<b>Priority Need Name</b>	Fair Housing Counseling
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Extremely Low Low Moderate
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	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.
<b>14</b>	<b>Priority Need Name</b>	Infrastructure
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Persons with Disabilities
	<b>Description</b>	The only infrastructure repairs that the Town will address with Block Grant funds over the next 5 year period will be the restoration and repair of the ADA accessible ramps at intersections throughout the Town concentrating on areas near schools, medical facilities and where specifically requested by residents in need.
	<b>Basis for Relative Priority</b>	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.

	<b>Priority Need Name</b>	Acquisition Rehabilitation Resale
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate
	<b>Description</b>	The Town will purchase vacant deteriorated property through mortgage or tax foreclosure, estate sale or short sale. The rehabilitation will return the property to acceptable state code condition or better and make this property affordable to a low-moderate income first time homebuyer.
	<b>Basis for Relative Priority</b>	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 l/m homebuyers can afford that are habitable. The Town has also formed a Distressed Property Task Force to address some of these abandoned property issues.
16	<b>Priority Need Name</b>	Historic Preservation
	<b>Priority Level</b>	high
	<b>Population</b>	
	<b>Description</b>	The Village of Williamsville is home to many historic structures and many have been given landmark status. The Village will use their share of the CDBG funding over the next three years for the restoration of the Mennonite Meeting House. The roof will be replaced and the stained glass windows will be repaired and reglazed. The project will be considered under the spot slum and blight designation.
	<b>Basis for Relative Priority</b>	Many of the existing historic buildings in the Village are in need of repair to maintain their viability.

## SP-30 Influence of Market Conditions – 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.
New Unit Production	As described in previous sections, ACT Consortium Members will not use HOME funds for development of new housing units.
Rehabilitation	As described in previous sections, 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.
Acquisition, including preservation	ACT Consortium members will provide HOME funds for acquisition/rehab/resale of property to provide affordable housing for first-time homebuyers. The Town of Tonawanda will utilize Neighborhood Stabilization Program funds from NYS HFA for acquisition/clearance/new construction activity in the Sheridan Parkside neighborhood. The Town of Cheektowaga will utilize Neighborhood Stabilization Program (NSP) funds in the Walden Target Area for acquisition/rehabilitation of single family homes and for clearance of uninhabitable homes.

**Table 45 – Influence of Market Conditions**

### ***Rental Assistance***

High housing costs reduce economic opportunities and access to prosperity, especially among lower-income racial and ethnic minorities in the ACT HOME Consortium. Renters are much more likely than homeowners to experience housing problems, among which cost burden is by far the most prevalent. Severely cost burdened renter households earning 0-30% of the HUD Area Median Family Income (HAMFI) have the greatest housing need, representing nearly 30% of renter households that reported a housing problem and 14% of all households that reported a problem. In 2011, the latest year for which data in this section was available, the HAMFI for Erie County was \$65,258. Therefore, the 0%-30% HAMFI category includes households earning \$19,577 or less per year.

Cost burden is a problem shared by both owner and renter households throughout the Consortium. While cost burden and severe cost burden are most likely for extremely low-income households earning below 30% of HAMFI, very low-income owner households earning between 50% and 80% of HAMFI are the largest cost-burdened group. Consequently, ACT HOME Consortium members will focus assistance on low-income owner households earning between 50% and 80% of HAMFI. The Consortium will coordinate with Belmont Shelter Corporation and refer households needing rental assistance to that organization.

### ***Production of new units***

The overall community development focus of the Consortium towns is to maintain the suitable living environment that they now enjoy. Accordingly, the towns will continue to focus CDBG resources on actions designed to rebuild infrastructure, encourage reinvestment, improve the quality of life and create employment opportunities for low- and moderate-income residents. The Consortium towns will refrain from building new units in the foreseeable future.

### ***Rehabilitation of existing units***

As reported in the ACT HOME Consortium Needs Assessment, more than 850 renter households experience at least one type of housing problem, including overcrowding, lack of kitchen facilities and/or lack of bathroom facilities, though there may be some overlap across these categories. Lack of complete kitchen or plumbing facilities is the most common physical housing problem for renters. Overcrowding is the most common for owners. Physical housing problems are most common among renter households in the 50%-80% of HAMFI category. Consequently, ACT Consortium members will focus considerable resources on owner-occupied housing rehabilitation loans and deferred loans.

### ***Acquisition of existing units (including the preservation of affordable housing units)***

The Town of Tonawanda will utilize Neighborhood Stabilization Program funds from NYS HFA for acquisition/clearance/new construction activity in the Sheridan Parkside neighborhood. The Town of Cheektowaga will utilize Neighborhood Stabilization Program (NSP) funds in the Walden Target Area for acquisition/rehabilitation of single family homes and for clearance of uninhabitable homes. The Consortium will use HOME Program funds to acquire/rehab/resell vacant housing units to provide affordable housing to first-time homebuyers.

**SP-35 Anticipated Resources - Amherst - 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 Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning					\$1,833,800	
		Economic Development						
		Housing						
		Public Improvements						
		Public Services	\$480,000	\$200,000	0	\$680,000		

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction  Multifamily rental rehab  New construction for ownership  TBRA	\$698,500	\$250,000	\$0	\$948,500	\$2,670,600	
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**Table 46 - Anticipated Resources**



## **SP-40 Institutional Delivery Structure – 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.

The Town of Amherst acts as the Participating Jurisdiction for the Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium. The Town also acts as the lead public housing agency for the Erie County PHA Consortium. In this capacity, the Town interacts with Belmont Housing Resources for WNY, the management agent for the PHA, and with other entities receiving CDBG funds in Erie County. Community development staff in each of the three towns will coordinate the administration of federal HOME Investment Partnerships Program grant funds and Community Development Block Grant funds.

New Opportunities Community Housing Development Corp. is one of the development corporations that will manage the projects involving the acquisition and rehabilitation/new construction of housing for the Consortium. Housing Opportunities Made Equal (H.O.M.E.) will advocate for victims of perceived housing discrimination and offer informational workshops on housing discrimination to ACT Town officials.

The Buffalo Urban League (BUL) will advocate for victims of predatory lending practices, both in cases of existing homeowners attempting to refinance mortgages and new homebuyers in need of mortgages. Counseling is also available for residents with consumer credit issues, and BUL will provide free legal services for the low-income elderly and households facing mortgage defaults or foreclosures.

Belmont Housing Resources for WNY will administer housing counseling services for recipients of first-time homebuyer assistance under the HOME and Federal Home Loan Bank programs; for households in danger of mortgage default; at-risk households in danger of becoming homeless; and tenant-landlord disputes.

Supportive Services Corp. will administer weatherization services for low-income households, providing energy efficient heating and insulation upgrades.

Amherst and Cheektowaga will work with the New York State Affordable Housing Corporation to administer funds to assist homeowners with housing rehabilitation loans. The Town of Tonawanda will utilize Neighborhood Stabilization Program funds from NYS HFA for acquisition/clearance/new construction activity in the Sheridan Parkside neighborhood. The Town of Cheektowaga will utilize Neighborhood Stabilization Program (NSP) funds in the Walden Target Area for acquisition/rehabilitation of single family homes and for clearance of uninhabitable homes. (There are no census tracts in Amherst that qualify for NSP funds.)

The Consortium towns will also work to encourage various non-profit housing agencies to secure funding for Section 202 housing for the elderly, and for tax credit housing for low-income residents. The towns will also continue to seek available resources through state agencies to meet the goals identified in the Consolidated Plan.

While there will always be limitations on the availability of funding to address housing needs, the delivery system represented by the foregoing agencies represents a significant array of resources brought to bear on the housing needs of the Consortium towns. No specific gaps are apparent in this network of agencies.

## SP-45 Goals Summary -Amherst– 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Housing Stock	2015	2019	Affordable Housing	Maintain and Improve Housing Stock Safe, secure and affordable rental housing	CDBG \$1,198,800  HOME \$725,000	Code Enforcement – 5,000 Housing Units inspected; Handicap accessibility – 5 Housing Units rehabilitated; Homeowner Housing Rehabilitated: 79 Household Housing Units (CDBG -50; HOME – 29)

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
2	Promote Affordable Homeownership	2015	2019	Affordable Housing	Promote Affordable Homeownership	CDBG \$72,500  HOME \$500,000	500 households assisted via counseling (CDBG); Direct Financial Assistance to Homebuyers: 10 Households Assisted (HOME); 3 Housing Units acquired/rehabbed & resold (HOME)
3	Provide Assistance to persons at risk of Homelessness	2015	2019	Affordable Housing	Promote Safe, secure and affordable rental housing Suitable Environment and Service Provision.	CDBG \$25,000	750 persons assisted

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
4	Special Needs Population	2015	2019	Affordable Housing Non-Homeless Special Needs	Safe, secure and affordable rental housing Suitable Environment and Service Provision I/m	CDBG \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 8000 Persons Assisted via 25 ramps; 2 Housing Units rehabbed
5	Rental Housing Owner-occupied Rehabilitation	2015	2019	Affordable Housing	Maintain and Improve Housing Stock Safe, secure and affordable rental housing	CDBG \$50,000	Rental units rehabilitated: 2 Household Housing Units
6	Weatherization Assistance	2015	2019	Affordable Housing	Maintain and Improve Housing Stock	CDBG \$25,000	65 Household Housing Units weatherized

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
7	Affirmatively Further Fair Housing	2015	2019	Affordable Housing Public Housing Non-Homeless Special Needs	Accessibility and Mobility Promote Affordable Homeownership Safe, secure and affordable rental housing Suitable Environment and Service Provision I/m Housing and Employment free from Discrimination	CDBG \$25,000	Public service activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted
8	Historic Preservation/ /Elimination of Slum and Blight	2015	2019	Preserve historic sites and eliminate blight	Suitable Environment and Service Provision I/m	CDBG \$168,000	Historic building preservation: 3 structures
9	Community Services	2015	2019	Non-Homeless Special Needs	Suitable Environment	CDBG \$260,000	Public service activities to benefit 3,520 I/m income persons

Table 47 – Goals Summary

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

The Towns of Amherst and Cheektowaga do not have any public housing developments. However, the Kenmore Housing Authority (KHA) has two developments within the boundaries of the Town of Tonawanda. Kenmore Village Apartments and Theater Apartments each offer 100 one-bedroom units for the elderly. There are 10 accessible units in each building. KHA's buildings are normally at full occupancy.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

**Zoning:** Local zoning ordinances may present barriers to addressing affordable housing needs. ACT Consortium municipalities have not adopted flexible zoning tools (such as inclusionary zoning or density bonuses) to promote affordable housing development.

Manufactured homes provide affordable housing options for many households. Although ACT Consortium municipalities include provisions for manufactured homes in their zoning ordinances, the ordinances contain many restrictions on such homes.

**Lack of supply:** Countywide, there is a limited supply of subsidized rental units targeted to meet the needs of families and low-income households. Most of the county's subsidized rental units are elderly units, and all 200 units of public housing within the ACT Consortium are elderly units. The supply of subsidized housing for families and people with disabilities is severely lacking.

**Unaffordable housing costs:** Median housing values for owner occupied housing are beyond the affordability of many of the ACT Consortium's households. For households with incomes 80% or more below the area's median household income, homeownership is unlikely without government subsidies or the adoption of land use tools such as inclusionary zoning. The high cost of labor and materials and lead-based paint remediation are other potential barriers to the production of affordable housing in the Consortium. This obstacle has proven more intractable in part due to federal Davis-Bacon Act requirements that apply to most housing developments assisted with either CDBG or HOME funds.

**Need for additional affordable housing funding:** Stagnant wages and rising housing costs have increased demand for affordable housing in the region, including in the communities in the ACT Consortium. Cuts in public funding for homeless facilities and subsidized housing have left Erie County and the ACT Consortium with fewer resources to address continuing and increasing demand.

Erie County and the ACT Consortium are conducting a new Analysis of Impediments to Fair Housing Choice that will be completed in 2015. The new Analysis of Impediments may identify other barriers to affordable housing in the ACT Consortium towns.



## **SP-60 Homelessness Strategy – 91.215(d)**

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

#### **Addressing the emergency and transitional housing needs of homeless persons**

Although homelessness is not perceived as a significant problem in the ACT Consortium towns, the Consortium is committed to 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. The Consortium supports the efforts of the Homeless Alliance of Western New York as the Collaborative Applicant of the Continuum of Care. The Homeless Alliance of Western New York is the designated Continuum of Care (CoC) agency for Erie County. As such, it is responsible for compiling the annual Continuum of Care grant from the Department of Housing and Urban Development (HUD).

#### **Progress Toward Ending Chronic homelessness**

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. The table below demonstrates the progress to date. (Please note that the data in the following tables is for all of Erie County, not the ACT Consortium towns.)

**Table H1: Progress Toward Ending Chronic homelessness**

	Proposed in 2012 CoC Application	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-1.1a For each year, provide the total number of CoC-funded PSH beds not dedicated for use by the chronically homeless that are available for occupancy.		628	656	656
3A-1.1b For each year, provide the total number of PSH beds dedicated for use by the chronically homeless.	83	103	183	223
3A-1.1c Total number of PSH beds not dedicated to the chronically homeless that are made available through annual turnover.		104	110	110
3A-1d Indicate the percentage of the CoC-funded PSH beds not dedicated to the chronically homeless made available through annual turnover that will be prioritized for use by the chronically homeless over the course of the year.		12%	85%	85%
3A-1.1e How many new PSH beds dedicated to the chronically homeless will be created through reallocation?		80	20	0

Source: 2013 Annual Report on the State of Homelessness in Erie County

Increasing Housing Stability is a major goal of the Alliance. The table below illustrates the progress achieved in increasing housing stability.

**Table H2: Increasing Housing Stability**

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-2.2a Enter the total number of participants served by all CoC- funded permanent supportive housing projects as reported on APRs submitted during the period between October 1, 2012 and September 30, 2013:	912	1039	1085
3A-2.2b Enter the total number of participants that remain in CoC- funded funded PSH projects at the end of the operating year PLUS the number of participants that exited from all CoC- funded permanent supportive housing projects to a different permanent housing	839	956	998
3A-2.2c Enter the percentage of participants in all CoC-funded projects that will achieve housing stability in an operating year.	92%	92%	92%

Source: 2013 Annual Report on the State of Homelessness in Erie County

**Accessing Mainstream Benefits**

Over the past two years, the Alliance has exceeded HUD's standard for increasing the number of participants obtaining mainstream benefits. In fact, the Alliance projects that it will exceed the standard by 10 points during the next year as illustrated in the following table.

**Table H3: Accessing Mainstream Benefits**

	2013 Actual Numeric Achievement and Baseline	2014 Proposed Numeric Achievement	2015 Proposed Numeric Achievement
3A-4.2a Enter the percentage of participants in ALL CoC-funded projects that obtained non-cash mainstream benefits from entry date to program exit.	64%	65%	66%

Source: 2013 Annual Report on the State of Homelessness in Erie County

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.

### **Using Rapid Re-Housing To Reduce Family Homelessness**

In the County ESG-funded Rapid Re-Housing Program, households with children who are victims of domestic violence are prioritized for entry into the program. Case management services are provided to households as needed or at a minimum of once per month. Generally, there is case management contact at least weekly, if not daily, at the front end of the program while searching for and securing permanent housing, linking participants to public benefits, moving from shelter to permanent housing, etc. Once the participants are stable in housing and the rental subsidy begins to decrease, the frequency of case management contact is also likely to be less often. There will be at minimum a monthly case management contact for the duration of participation in the program.

### **Discharge Planning**

NYS does have a discharge planning policy in place for persons discharged from foster care. Documents provided from the Erie County Office of Child and Family Services are based on NYCCR Title 18 Section 430.12 and clearly indicate that any child leaving foster care must be placed in appropriate housing. Appropriate housing is considered apartments, small boarding homes, housing with friends or family, but not a shelter, SRO, or congregate living with more than 10 individuals. Most youth discharged from foster care return to their family of origin or another responsible family member or adult. If returning to family is not an option, the youth is placed in a residential program, Gateway- Longview, that is specifically designed to assist with transitioning from foster care to independent living. When it does not work out for youth who were discharged to their family after a period of time; there are two transitional housing programs for those youth who become homeless that provide housing and assistance with transitioning to independent living. In 2012, 545 young adults (ages 12 - 24) were entered into HMIS; 10 records had a prior living situation of foster care.

### **Strategic Plan Goals for ESG Allocations**

The CoC has developed a strategic plan for implementation of its homelessness prevention goals. Strategic plan goals include: 1) Prevent homelessness by increasing access to mainstream benefits to low income households; 2) Implement Housing First strategies; 3) Develop adequate supply of permanent affordable housing that includes permanent supportive housing units that target the chronically homeless; 4) Prioritize homeless outreach services that consistently engage chronically homeless; 5) Monitor system discharge protocols to ensure that persons are not being routinely discharged to homelessness; 6) Reduce the length of stay of homeless households in the homeless system by implementing rapid re-housing programs; 7) Reduce

repeat episodes of homelessness; 8) Develop and implement a coordinated entry system to ensure that homeless households are referred to programs that will best meet their needs and ensure that those with the highest needs are prioritized.

The CoC has incorporated all of HUD's Strategic Plan and the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness into its goals and objectives for ending chronic homelessness and veteran homelessness by 2015. It will strive to end family and youth homelessness by 2020 and set the path to end all homelessness in its strategic plans to prevent and end homelessness. With the Veteran One Stop Center, increased HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers, and a Supportive Services for Veterans Families (SSVF) program now funded, the CoC appears to be in a position to end veteran homelessness assuming the current level of resources is maintained. The CoC projects a sufficient supply of Chronic Homeless (CH) beds will be developed through reallocation and prioritizing turnover beds to meet the target for ending chronic homelessness by 2015. After 2015, the CoC will need to continue increasing Rapid Re-Housing (RRH) program capacity until 250 families are assisted annually. The CoC projects capacity for 175 by 2015, so it appears to be on target to end homelessness for youth and families by 2020.

The CoC monitors project performance at least twice each year. Projects are required to attach their most recent Annual Performance Report (APR) submitted to HUD with their local application. Performance is a heavily weighted scoring criteria and impacts the ranking of projects. APR data from 10/1 - 9/30 is also used to publish the Annual CoC Project Performance report which reports project performance across the CoC. In addition to providing system wide data on performance, projects are able to compare their performance with similar projects in the CoC. Now that performance benchmarks have been established for emergency shelters and outreach programs through the Written Standards, in 2014, ESG projects will also be included in the annual report. The annual CoC Performance Report also reports on system-wide measures: reducing length of stay in the homeless system and reducing repeat episodes of homelessness.

### **Homelessness Recidivism**

Annually the CoC produces a State of Homelessness report that has a section on recidivism (returns to homelessness). HMIS data is used to determine the number of homeless persons who had at least one entry into the homeless system in the two years prior to the current year being measured. The 2012 report indicated that 20% of homeless persons had been in the system in the prior two years. Looking only at participants who exited to permanent housing, the recidivism rate drops to 7%. There were no RRH programs in operation for the 2012 report. Future reports will include data that focuses on those exiting from RRH and Permanent Supportive Housing (PSH) programs. The scope of work for one RRH program includes a follow-up component. "211WNY" will make monthly phone calls to RRH "graduates" (when case

management services end) to monitor housing stability and link to community resources when problems are identified before there is a crisis. As the CoC moves forward with coordinated entry, connecting homeless persons to the services most appropriate for their needs should further decrease repeat episodes of homelessness.

A primary goal of the Rapid Re-Housing (RRH) model is reducing the length of stay in the homeless system. Three ESG-funded RRH programs began operating in 2013 and a new SSVF RRH program began operation 11/2013. A landlord outreach committee has been formed to develop relationships with landlords to increase the inventory of units for RRH and PSH programs, which will result in a faster transition to permanent housing.

The CoC regularly shares information on available funding resources for homeless programs. . It is actively engaged with Health Homes providers to coordinate services. The CoC web site is being redesigned and will have a section identifying funding opportunities. The CoC has also been making its members aware of the limited funding options available and continues to advocate for additional local resources to be identified to provide support services.

The ACT Consortium is committed to helping 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.

## **SP-65 Lead based paint Hazards – 91.215(i)**

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

As noted in the Market Analysis section of this Consolidated Plan, there are few cases of children with elevated blood lead levels in the suburbs of Buffalo, including the ACT Consortium towns. However, the ACT Consortium towns will continue to support the efforts of county and state health agencies and other parties to reduce lead-based paint hazards in ACT Consortium homes. The Consortium will help accomplish this goal via its various residential rehabilitation programs, which require remediation of lead-based paint hazards that are identified in pre-rehabilitation inspections.

#### Child Lead Paint Poisoning Prevention Program

Elevated blood lead levels (EBL) in children are the most critical issue in dealing with lead-based paint (LBP). Under a state funded and mandated program, the Erie County Department of Health (DOH) is required to respond to all cases of children with elevated blood levels. Most of these cases are referred to DOH by doctors or other medical professionals. Corrective action usually requires interim control, which basically stabilizes the housing unit's paint and makes the housing unit safe for occupancy; the cost of remediation is borne by the owner of the property.

#### Healthy Neighborhoods Program

Funded by a New York State grant, the Healthy Neighborhoods Program has been operated by DOH for about twenty years. The goal of the program is to identify housing conditions that lead to a poor quality of life and health hazards that may be detrimental to a household's well being. The program conducts door-to-door surveys to complete "sweeps" of designated high-risk neighborhoods. The program also offers referrals to other specific programs and agencies within Erie County that can assist occupants in improving their health, safety, or well-being. A visual paint assessment is completed through a home visit, and the occupant and/or owner are notified of potential lead hazards. Any housing violations that are cited are followed up with enforcement action.

#### Awareness, Education, and Prevention

The Erie County Department of Health has several brochures on its lead poisoning prevention program, including phone numbers to call for information and assistance. In January 2009, the Community Foundation of Greater Buffalo was awarded a \$300,000 grant from HUD to undertake an outreach program to promote awareness, education and prevention for lead-

based paint hazards. The outreach program is underway and includes billboard, radio, TV, and door-to-door initiatives along with sponsorship of various meetings.

#### Lead-Based Paint Remediation in the ACT HOME Consortium

There are several components of lead hazard reduction efforts integrated into the Consortium's housing policies and programs. Education includes verbal and printed information regarding lead-based paint hazards distributed at required pre-purchase counseling and at intake for housing rehabilitation programs. Brochures, including "Protect Your Family from Lead in Your Home" from the EPA (May, 1995) are included in every housing application, for every housing program in the Consortium. Additional information is provided for those who do not pass a visual assessment for lead-based paint hazards ("Lead Paint Safety: A Field Guide for Painting, Home Maintenance, and Renovation Work" by HUD). A community program, "Lead Hazard Control Training" offered by Lead Connections, is also recommended for applicants and potential applicants.

Efforts to assure compliance include visual assessments, verbal questioning during intake, and written questions on the rehabilitation application form. All housing cases include a visual assessment for lead-based paint hazards: peeling, cracking, chipping or flaking paint. If the home fails a visual assessment, it must be abated and cleared by certified lead paint firm.

Through the ACT Consortium housing programs, including the first-time homebuyer program, risk assessments for lead-based paint hazards are undertaken on properties built before 1978 that show evidence of flaking or damaged paint and/or that will undergo rehabilitation where painted surfaces will be disturbed. Approximately 75%-95% of the housing units rehabilitated through these programs have lead-based paint hazards present. If lead-based paint hazards are present, lead-based paint remediation is required.

#### Private LBP Hazard Remediation

In addition to governmental initiatives, a significant amount of LBP hazard remediation is taking place privately within the Consortium as individuals and families undertake rehabilitation and improvement of properties in which they currently live or have recently purchased. Many of these households, however, are likely to be above low- and moderate-income levels.



## **SP-70 Anti-Poverty Strategy – 91.215(j)**

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

The Erie County Department of Social Services is involved in numerous efforts to reduce the number of people living below the poverty level. 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.

The Department of Social Services hopes to bring 1,200 persons per year for each of the next five years over the poverty level. The following programs are employed to help meet this objective:

#### **Welfare Reform**

a.) Transitional Opportunity Program (TOP): The Transitional Opportunity Program was developed to provide supportive services to TANF clients that have recently exited from the TA system due to employment. TOP provides an array of post-employment job retention services to continue to support families as they negotiate the world of work. The TOP philosophy is to provide continued support so those obstacles between working families and independence can be overcome.

b.) Transition to Work Teams: Employed TANF clients are being served by special teams to assure smooth transitions from welfare to work to independence. Staff in these teams provide benefit counseling, child care authorizations, and transitional Medicaid and Child Care upon case closing.

c.) Job Clubs: All employable applicants for TA are assigned to a three- week Job Club as a requirement to receive benefits. During this time, participants receive training on job searching and job retention and are given a resume and job leads. This has resulted in many job placements for participants and has diverted them from receiving TA.

#### **Employment Programs**

a.) Wage Subsidy programs: The Department sponsors the PIVOT wage subsidy program, which provides a six-month wage subsidy to area employers for hiring a TANF client. There are over 400 clients placed annually, with a job retention rate of over 80%.

b.) Workfare: All employable recipients are required to be in a work activity. The Department has developed worksite “hubs” throughout the City of Buffalo where clients are assigned to report. At these hubs the client receives work experience and also needed training including

GED and ESL. Close supervision is provided and qualified individuals are identified and recommended by the site supervisors for available jobs.

c.) BRIDGE: This program developed as a result of coordination between the Department of Social Services and the State University of New York

(SUNY). SUNY operates the Educational Opportunity Center (EOC), which provides job training and educational preparation services to low- income individuals.

### **Interagency Initiatives**

a.) The Erie County Parks Opportunity Program (POP): This program is a systematic approach to gradually increase clients' skill and knowledge levels through a partnership with the Buffalo Board of Education and Greater Buffalo Works, a not-for-profit training entity. The program calls for TANF clients to participate in a four-week training program and then be assigned to a workfare site to utilize the skills learned and then to be linked with available jobs.

### **Family Preservation and Domestic Violence**

a.) Domestic Violence: The Department's Domestic Violence Unit works closely with staff in all program areas to assist victims of domestic violence to find safe housing, needed counseling, and linkage to any needed services. Staff work closely with The Family Violence Center to coordinate efforts and assure safety.

b.) The Erie County Works Center: This is a unit designed to do two things: quickly determine the employability of applicants and to reconnect them to the job market as soon as possible. Emphasis is placed on seeking employment for all able-bodied applicants, and medical/mental health attention for those currently unemployable.

c.) The Family Justice Center has opened a satellite facility in Amherst to provide access to services for those escaping abuse or domestic violence in the northtowns.

### **Metropolitan/Regional Connections**

The three Consortium communities are involved in and have an interest in regional and interjurisdictional issues. For example, the three Consortium towns border on the South Campus of the State University of New York at Buffalo, which is located inside the City of Buffalo. The Consortium towns have collaborated with UB and City of Buffalo initiatives in the past and will be interested in doing so in the future to improve the living environment in their neighborhoods that border the UB campus.

Another example of inter-jurisdictional cooperation is joint planning efforts among the ACT Consortium towns and adjacent municipalities to achieve mutual goals.

On broader issues, the Consortium communities support the mission and initiatives of the Buffalo-Niagara Enterprise (BNE), which is to encourage economic development (including increased cooperation and collaboration among economic development agencies) in the two-county metropolitan area. This has required responding to various requests from BNE on policy issues and to have information prepared and readily available for national marketing initiatives.

Also, the Towns cooperate in providing information to the Regional Institute at UB. This is a long-term initiative to collect and analyze data on a variety of economic and social indicators not only for the metropolitan area, but also the western New York counties and the Southern Ontario Niagara peninsula. The Institute maintains the Regional Knowledge Network as a major data source for the BNE and the region.

The ACT Consortium towns are also interested in their role in implementing the One Region Forward plan, the comprehensive, sustainable economic development strategy for Erie County and Niagara County. Key goals in the plan center around improving mobility, promoting more efficient land use patterns, strengthening basic infrastructure, growing a 21st century economy, ensuring broad access to healthy food, protecting housing and neighborhoods, and mounting the region's response to the challenge of global climate change.

### **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**

Each of the towns hold regular in-house meetings within their community development divisions to assure that projects are moving along in a timely manner, and that regulatory requirements are being addressed both in-house and by subgrantees and contractors.

The Town of Amherst, as Participating Jurisdiction (PJ) for the HOME grant, regularly monitors the expenditure of HOME funds by each of the participating towns through IDIS. The regulatory process for annual applications and performance reports provides a structure for monitoring the development of projects that address the intent of the Consolidated Plan and HUD requirements. The PJ conducts a formal monitoring of subgrantees on site at least once each year using the HUD monitoring checklists for relevant program activities.

## Appendix - Alternate/Local Data Sources

<b>1</b>	<b>Data Source Name</b> Maplebrook Survey Data
	<b>List the name of the organization or individual who originated the data set.</b> City
	<b>Provide a brief summary of the data set.</b> Survey conducted by City
	<b>What was the purpose for developing this data set?</b> Detailed analysis of potential target area
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b>
	<b>Briefly describe the methodology for the data collection.</b>
	<b>Describe the total population from which the sample was taken.</b>
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b>
<b>2</b>	<b>Data Source Name</b> 2013 ACS data
	<b>List the name of the organization or individual who originated the data set.</b>

	<p><b>Provide a brief summary of the data set.</b></p>
	<p><b>What was the purpose for developing this data set?</b></p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p>
	<p><b>Briefly describe the methodology for the data collection.</b></p>
	<p><b>Describe the total population from which the sample was taken.</b></p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p>