

# **FINAL 2025-2029 Consolidated Plan and 2025 Action Plan of the 2025-2029 Five-Year Consolidated Plan**

## **PREPARED FOR THE**

Erie County / Town of West Seneca Community Development  
Block Grant Consortium, and the

Erie County / Town of Hamburg / Town of West Seneca Home  
Consortium, and the

Town of Hamburg – Community Development  
Entitlement Program

### **Submitted by:**

The Erie County Department of Environment and Planning

**HON. MARK C. POLONCARZ**  
COUNTY EXECUTIVE

**DANIEL R. CASTLE**  
COMMISSIONER

**May 20, 2025**

**Erie County Urban Consortium / Town of Hamburg**  
**2025-2029 Consolidated Plan and 2025 Annual Action Plan**  
**of the Five-Year Consolidated Plan**

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## **Executive Summary**

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

#### **1. Introduction**

The Erie County Community Development Block Grant (CDBG) Consortium is made up of 34 municipalities. The Erie County Department of Environment and Planning (DEP) administers the CDBG and Emergency Solutions Grant (ESG) Program grants on behalf of the CDBG Consortium communities. The DEP also administers the Erie County HOME Consortium, which is comprised of the 34 CDBG Consortium municipalities and the Town of Hamburg and its two villages—the Villages of Hamburg and Blasdell.

The Erie County CDBG Consortium and Erie County HOME Consortium are required to prepare this Five-Year Consolidated Plan (CP) for the CDBG, HOME and ESG federal grant programs in order to guide federal funding allocations for housing, community development and economic development activities within their communities. This CP covers the period from FY 2025 through FY 2029 (April 1, 2025 to March 31, 2030).

The FY 2025-FY 2029 CP for the Erie County Consortia CDBG, ESG, and HOME Programs includes a clear strategy for addressing the various housing, economic development, and community development needs within the Consortia. Erie County will receive receiving the following grant amounts in fiscal year 2025.

- CDBG: \$2,994,630 (about \$14,973,150)
- HOME: \$921,686 (about \$4,608,430)
- ESG: \$234,812 (about \$1,174,060)

-

#### **Purpose of the Consolidated Plan**

The purpose of the 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 CP 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 Consortia will use with available resources over the next five years. The CP was formulated using HUD's eCon Plan tool, which dictates the plan's structure and provides a series of pre-populated tables. In some cases, the Consortia 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 Needs Assessment and Market Analysis sections of this Consolidated Plan tell a story that is quite similar to the feedback that was received at the stakeholder meetings and through public outreach; namely, the lack of quality affordable housing is a massive problem for markets, but especially when it comes to affordable housing. The County's investment plan for 2025-2029 reflect those findings with approximately \$10 million in CDBG and HOME funds projected to be spent on housing initiatives. Approximately \$7.7 million will be spent on rehabilitation programs for renters and owners, and that spending will include some targeted investments in lead remediation, radon mitigation, utility connections, emergency repairs, and accessibility improvements. An additional \$2.3 million will be focused on leveraging projects that can create new affordable units within the Consortium.

Another significant issue identified in the stakeholder meetings and public outreach process was transportation and how the lack of options for transportation restrict low- and moderate-income individuals' access to employment opportunities and goods and services. As a result of this consistent finding, the Erie County Consortium will continue to invest in transportation services, especially in the

rural areas of the Consortium, which will account for approximately 80% of the allocation of Public Service funds.

Additionally, the Erie County Consortium will be making investments in small businesses as well as investments in smart growth initiatives and commercial centers in order to create economic opportunities and to do so in areas with a high critical mass to improve access to the economic development for low- and moderate-income households.

### **3. Evaluation of past performance**

The Consortium'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. Due to COVID-19 there were additional resources made available over the course of the most recent Consolidated Plan, through CDBG-CV, ESG-CV, and HOME ARP. In Program Year 2023, the Erie County Consortium expended \$5,004,659 in CDBG and CDBG-CV funds, \$1,052,449 in HOME and HOME ARP funds, and \$491,469 in ESG and ESG-CV funds.

The following is a summary of the Consortium's past performance as reported to HUD in the FY2023 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed.

Administration: As of January 31, 2024, Erie County's timeliness of expenditure of funds standard percentage was 1.38 times the dollar amount of the 2023 CDBG grant award in the unexpended category. Therefore, the 1.5% standard was met.

Other key administrative achievements were the expenditure of 100% of all non-planning/admin monies on activities targeted to benefiting low/moderate income people, as well as staying under the required administrative cap of 20% by expending 16.19% on planning and administration. 8.58% was expended on public service activities which is below the 15% cap.

Community Projects: 10 projects were completed in 2023 benefitting low/moderate income people. The Rural Transit Service Program continued its successful efforts by helping 1,514 seniors and low-income people gain better access to shopping and medical appointments.

Economic Development: In 2023 the Commercial Center Improvement Program continued exterior rehabilitation with CDBG funding assistance with one completed project in the Hamlet of the Town of Eden and Village of Angola. There was a total of 1 completed project for facade improvements in 2023.

Housing: Taken together, the Erie County housing programs assisted 97 low/moderate income households in 2023. Goals were achieved in the mobile home repair, emergency repair and owner-occupied rehab programs.

#### **4. Summary of citizen participation process and consultation process**

The Erie County Consortium and the Town of Hamburg are committed to increasing citizen awareness and involvement in the preparation and implementation of the CDBG, HOME and ESG Programs. The development of the Consolidated Plans is a transparent and public process that includes multiple opportunities for the public to provide comments, ideas, and feedback. Additionally, the process seeks out feedback from practitioners and experts who work in the region on major issues that require federal support, including housing, homelessness, social services, transportation, economic development, and assistance to those with special needs. Lastly, the process involves direct interaction with municipal leaders from consortium communities.

Over the summer Erie County staff and the Consultant Team, along with representatives from the City of Buffalo and the Amherst, Cheektowaga Tonawanda (ACT) Consortium convened seven stakeholder meetings to discuss the needs of the region, as well as to get feedback on areas where the planning process can be improved, and investment can be targeted. The sessions were categorized as follows: Advocacy and Fair Housing, Community Housing Development Organizations and Community Based Development Organizations, Health & Human Services, Homelessness and Special Needs Housing, Property Owners and Managers (for profit and not-for-profit), Regional Agencies and Economic Development, and Resilience and Emergency Management. Additionally, the Consultant Team conducted a Zoom meeting to speak on all of the above topics for those who were unable to attend the meetings in person.

Erie County staff also distributed a survey over the summer to each of the 34 municipalities that make up the Erie County CDBG Consortium to develop a list of local priorities for services, planning, housing, or any other community needs. Then County staff and the Consultant Team held a follow up forum and invited each of the respective Chief Elected officials. Additionally, the municipalities within the Consortium are required annually to advertise and hold public hearings in their respective communities. During September and October of 2024, each municipality held a public hearing in its community to obtain suggestions on projects that meet low/moderate income population needs, prevent slum and blight, and/or meet urgent community needs.

The formal public comment period on the Draft 2025-2029 Consolidated Plan will extend from January 10 to February 10, 2025. Public hearings were held on January 21-23, 2025 to accept comments on the draft. All hearings were advertised in the Buffalo News and the Buffalo Criterion and posted on Erie County's website.

See the Citizen Participation Appendix, public hearing schedule and the public hearing public notice below for all sign-in sheets, meeting notes, additional comments received, and summary of community needs survey.

**CITIZEN PARTICIPATION PROCESS**

**2025-2026**

**ERIE COUNTY CDBG URBAN CONSORTIUM**

<u>SPONSOR</u>	<u>DATE</u>	<u>TIME</u>	<u>LOCATION</u>
ERIE COUNTY-			
CONSORTIUM-WIDE	9/16/2024	7:00 P.M.	TOWN OF HAMBURG
CITIZEN FORUMS:	9/17/2024	7:00 P.M.	VILLAGE OF DEPEW
	9/18/2024	6:30 P. M.	CITY OF LACKAWANNA
	9/19/2024	7:00 P.M.	VILLAGE OF NORTH COLLINS
MUNICIPAL HEARINGS:			
LACKAWANNA, C.	10/21/2024	9:30 A.M	CITY HALL COUNCIL CHAMBERS
TONAWANDA, C.	10/29/2024	5:00 P.M.	COUNCIL CHAMBERS
ALDEN, T.	10/7/2024	7:05 P.M.	TOWN HALL
ALDEN, V.	10/8/2024	6:35 P.M.	VILLAGE HALL
AURORA, T.	10/15/2024	7:00 P.M.	AURORA MUNICIPAL CENTER MEETING RM
EAST AURORA, V.	10/7/2024	7:00 P.M.	VILLAGE HALL
BOSTON, T.	10/16/2024	7:30 P.M.	TOWN HALL
BRANT, T.	9/10/2024	7:30 P.M.	TOWN HALL
FARNHAM, V.	8/20/2024	7:30 P.M.	VILLAGE HALL
CLARENCE, T.	11/6/2024	10:15 A. M.	TOWN HALL
COLDEN, T.	10/3/2024	7:00 P.M.	TOWN HALL
COLLINS, T.	10/21/2024	7:30 P.M.	TOWN HALL
GOWANDA, V.	10/8/2024	6:05 P.M.	VILLAGE HALL
CONCORD, T.	10/10/2024	6:15 P.M.	TOWN HALL
SPRINGVILLE, V.	10/7/2024	7:00 P.M.	VILLAGE MUNICIPAL BUILDING
EDEN, T.	10/23/2024	7:15 PM	TOWN HALL
ELMA, T.	9/18/2024	7:00 P.M.	TOWN HALL
EVANS, T.	10/2/2024	7:10 P.M.	TOWN HALL
ANGOLA, V.	10/21/2024	6:10 P.M.	VILLAGE HALL
GRAND ISLAND, T.	10/21/2024	8:00 P.M.	TOWN HALL
HOLLAND, T.	10/9/2024	7:00 P.M.	TOWN HALL
LANCASTER, T.	10/7/2024	7:05 P.M.	TOWN HALL
LANCASTER, V.	10/28/2024	7:15 P.M.	VILLAGE HALL
DEPEW, V.	10/14/2024	7:00 P.M.	VILLAGE HALL
MARILLA, T.	10/22/2024	7:00 P.M.	TOWN HALL
NEWSTEAD, T.	9/23/2024	7:15 P.M.	TOWN HALL
AKRON, V.	10/7/2024	7:00 P.M.	VILLAGE HALL
NORTH COLLINS, T.	9/9/2024	7:30 P.M.	TOWN HALL
NORTH COLLINS, V.	10/15/2024	6:30 P.M.	VILLAGE MUNICIPAL OFFICE
ORCHARD PARK, T.	11/6/2024	7:00 P.M.	MUNICIPAL CTR.-BOARD ROOM
ORCHARD PARK, V.	9/23/2024	7:00 P.M.	MUNICIPAL CTR.
SARDINIA, T.	11/14/2024	6:30 P.M.	TOWN HALL
WALES, T.	9/10/2024	7:00 P.M.	COMMUNITY CENTER
WEST SENECA, T.	10/7/2024	6:00 P.M.	TOWN HALL-COURT
HAMBURG, T.	9/16/2024	7:00 P.M.	TOWN HALL- LOBBY

**Citizen Participation Hearing Schedule 1**

HAMBURG, T.	9/23/2024	7:00 P.M.	TOWN HALL- LOBBY
HAMBURG, T.	10/7/2024	7:00:00 P.M.	TOWN HALL- LOBBY
HAMBURG, T.	10/19/2024	12:00 P.M.	BLASDELL VILLAGE HALL - LOBBY
COORDINATING COMMITTEE	2/6/2025	10:00 A.M.	1004 RATH BLDG., BUFFALO
CONSOLIDATED	1/21/2025	6:30 P.M.	LACKAWANNA PUBLIC LIBRARY
PLAN ("DRAFT")	1/22/2025	6:30 P.M.	HAMBURG TOWN HALL
PUBLIC HEARINGS	1/23/2025	7:00 P.M.	CITY OF TONAWANDA

## Citizen Participation Hearing Schedule 2

## **PUBLIC NOTICE**

Erie County/Town of Hamburg  
2025 Action Plan of the  
Five-Year Consolidated Plan 2025-2029 and  
the Erie County and the Town of Hamburg  
2025-2029 Five Year Consolidated Plan and  
the Analysis of Impediments to Fair Housing Choice Study  
Community Development Block Grant (CDBG),  
Home Investment Partnership Grant (HOME) and  
Emergency Solutions Grant (HESG)

The Erie County Department of Environment and Planning, on behalf of the Erie County Community Development Block Grant and HOME Investment Partnership Consortia, has prepared a draft 2025 Action Plan. The document outlines the Consortia's goals and objectives relative to housing, economic development, community development and homeless issues with specific attention given to the needs of low/moderate households residing in the Consortia communities. Citizens can provide input on the Erie County 2025 Action Plan, the 2025-2029 Five Year Consolidated Plan and the Analysis of Impediments to Fair Housing Choice Study (AI) which are currently underway.

The following municipalities comprise the CDBG Consortium: Cities of Lackawanna and Tonawanda; Towns of Alden, Aurora, Boston, Brant, Clarence, Colden, Collins, Concord, Eden, Elma, Evans, Grand Island, Holland, Lancaster, Marilla, Newstead, North Collins, Orchard Park, Sardinia, Wales and West Seneca; Villages of Akron, Alden, Angola, Depew, East Aurora, Farnham, Gowanda, Lancaster, North Collins, Orchard Park and Springville. The HOME Consortium includes the above communities as well as the Town of Hamburg and the Villages of Blasdell and Hamburg.

The Action Plan for 2025 provides a basis for assessing performance against the Consolidated Plan and identifies specific projects for 2025. It also serves as a combined application for federal funds under three (3) of the U.S. Department of Housing and Urban Development's (HUD) formula grant programs, including CDBG, HOME and HESG.

The following HUD entitlement grants are anticipated: Erie County CDBG of \$3,007,262 plus estimated program income of \$325,000; Town of Hamburg CDBG of \$425,000 plus estimated program income of \$100,000; Erie County HOME Grant of \$902,943 plus estimated program income and/or recaptured funds of \$215,000; and Erie County Emergency Solutions Grant of \$244,655.

A public comment period on the draft Action Plan, the 2025-2029 Five Year Consolidated Plan and the Analysis of Impediments to Fair Housing Choice Study will be held from January 10 to February 10, 2025. Hard copies of the draft Action Plan and Consolidated Plan are available at the following locations: Erie County Department of

Environment and Planning, Edward A. Rath Building, 95 Franklin Street – Room 1053, Buffalo; Public Libraries in the Villages of Akron, Angola and Hamburg; the Towns of Concord, Lancaster and Hamburg (Lakeshore Library); and the Cities of Buffalo (Main Branch), Lackawanna and Tonawanda; Lackawanna City Hall; Tonawanda Municipal Building, Hamburg Town Hall, Hamburg Community Development Office at 6122 South Park Avenue, Lackawanna Municipal Housing Authority and Tonawanda Municipal Housing Authority. The Draft Action Plan can be viewed on Erie County's web site at [www.erie.gov](http://www.erie.gov) and Town of Hamburg's Draft Action Plan can be viewed on its website at [www.townofhamburgny.gov/195/community-development](http://www.townofhamburgny.gov/195/community-development)

#### **PUBLIC HEARINGS**

Three (3) public hearings have been scheduled to discuss the draft Action Plan for 2025, the 2025-2029 Five Year Consolidated Plan and the Analysis of Impediments to Fair Housing Choice Study (AI). The public is encouraged to attend these hearings, which will be held on Tuesday, January 21 at 6:30 p.m., Lackawanna Public Library, Community Room, 560 Ridge Road, Lackawanna; Wednesday, January 22 at 6:30 p.m., Hamburg Community Development,

6122 South Park Avenue, Hamburg and Thursday, January 23 at 7:00 p.m., City of

Tonawanda, Court Room, 200 Niagara Street, Tonawanda. Meeting rooms are fully accessible. Persons with special needs and who are unable to attend any of the three (3) public meetings can participate in a Public Hearing Meeting and Conference Call on Wednesday, January 22 at 9:30am at the Edward A. Rath County Office Building, 95 Franklin Street, 10<sup>th</sup> Floor, Room 1004, Buffalo, NY.

To participate by phone, call 716-858-2468; enter Meeting Number 6409 and Attendee Access Code 3690. Written comments on the draft Action Plan and Consolidated Plan will be accepted through February 10, 2025 by Paul D'Orlando, Principal Contract Monitor, Erie County

Department of Environment and Planning, Edward A. Rath County Office Building, 95 Franklin Street – 10<sup>th</sup> Floor, Buffalo, NY 14202, by fax at 716- 858-7248 or by e-mail to

[Paul.D'Orlando@erie.gov](mailto:Paul.D'Orlando@erie.gov) Written comments on Hamburg's draft Action Plan will be accepted through February 10, 2025 by the Town of Hamburg Department of Community Development, 6100 South Park Avenue, Hamburg, NY 14075 or by e-mail to [cdpublichearing@townofhamburgny.gov](mailto:cdpublichearing@townofhamburgny.gov)

Non-English-speaking persons or persons with Limited English Proficiency or special needs should contact Mariely Ortiz at (716) 858-1916 or [Mariely.Ortiz@erie.gov](mailto:Mariely.Ortiz@erie.gov) for further assistance or to access documents in another language.

Para asistencia en Español, se puede contactar a Mariely Ortiz (716) 858-1916 o [Mariely.Ortiz@erie.gov](mailto:Mariely.Ortiz@erie.gov)

## 5. Summary of public comments

The following identifies comments and responses made during the citizen participation process.

### Regional Agencies and Economic Development Stakeholders

- Infrastructure in need of updates, including water/sewer, roads/sidewalks, parks
- Public transportation and internet access are a concern in rural communities
- Lack of new starter homes, not profitable enough to build
- Need more public/private partnerships to meet the needs of a community

### Homelessness and Special Needs Housing Stakeholders

- Address affordable and subsidized housing shortage
- Add shelter and transitional housing capacity
- Strengthen supportive services, including life skills and language services
- Address regulatory issues that prevent shelters and affordable housing from being built

### CBDs/CHDOs Stakeholders

- Enhance community engagement processes to meet community needs
- Encourage banks to be more supportive in their housing loan qualification process
- Need to improve homebuyer training, including financial education
- Explore modular housing to address need for affordable and efficient housing solutions
- Assess the financial impact of the 2027 electric mandate

### Health and Human Services Stakeholders

- Lack of available and affordable housing options
- Lack of transitional housing and shelters for domestic violence victims (increased numbers of victims)
- Need to address language barriers; over 80+ languages in BPS alone
- Need for increased services for school age children, including mental health services
- Funding for nonprofits needs to be increased, including disaster preparedness
- Transportation barriers; bus routes have been cut and changed

### Housing and Property Owners/Managers Stakeholders

- Need to increase shelter capacity overburdened due to demand and extended stays
- Develop transition programs from shelters to housing
- Enhance homebuyer education to ensure long-term sustainability for homebuyers
- Address affordable housing; currently not affordable or large enough for families



- Improve public housing sustainability
- Strengthen supportive services; increased demand but limited funding and staff
- Monitor rental market; landlord-tenant relationships are strained
- Enhance maintenance and security
- Focus on needs of rural communities such as lack of grocery stores, healthcare, transportation

#### Advocacy and Fair Housing Organizations Stakeholders

- Increase education programs on fair housing laws for both tenants and landlords
- Increase enforcement of fair housing laws
- Not enough affordable housing options for singles or families

#### Resilience and Emergency Management Stakeholders

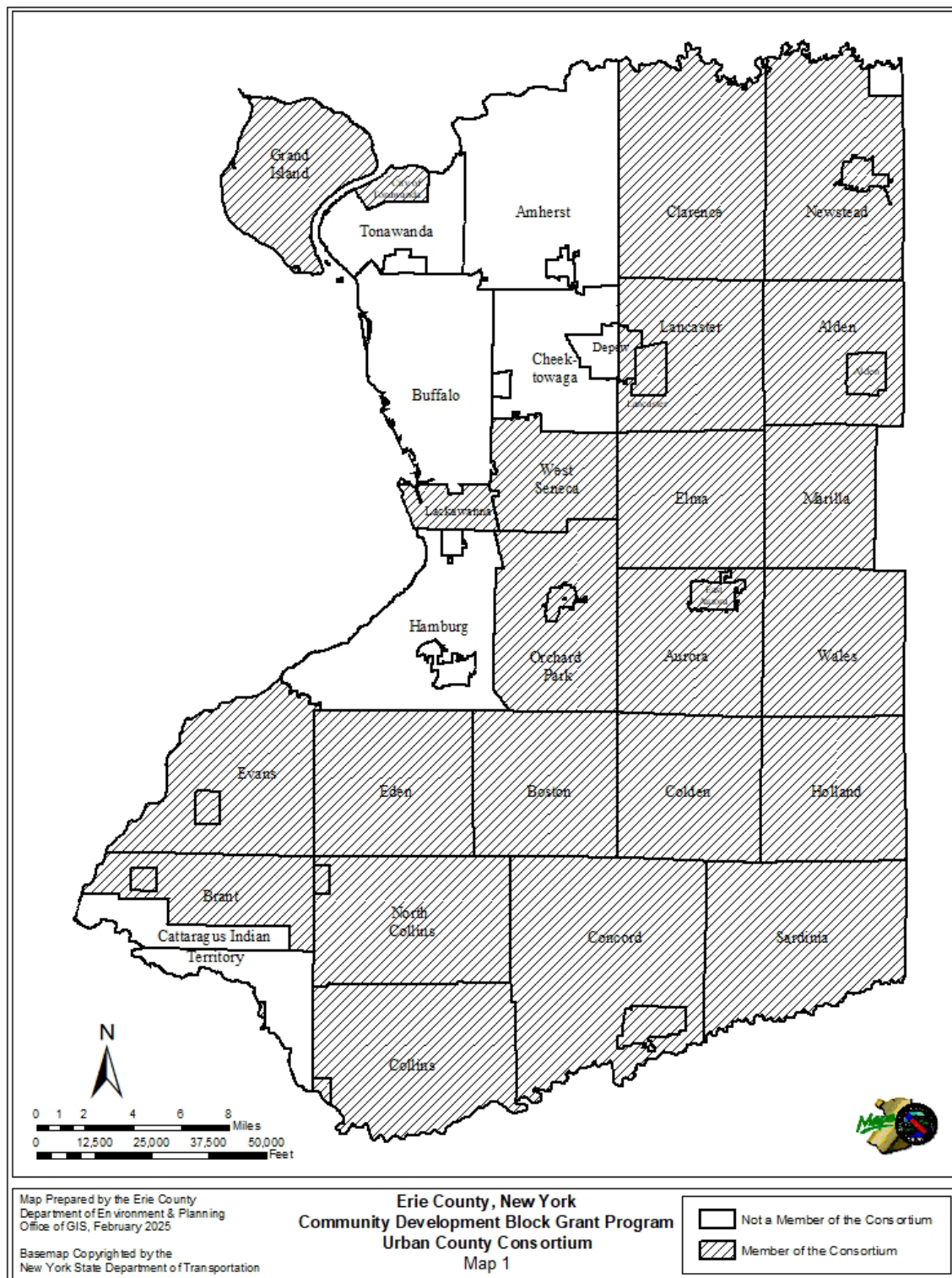
- Lower income neighborhoods at higher risk of negative impacts of climate change and extreme weather
- Coordination and capacity need to be addressed for emergency response
- New building techniques and proposed mandates need to be folded into construction and renovation programs
- Need for both urban and rural warming and cooling stations throughout Erie County

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

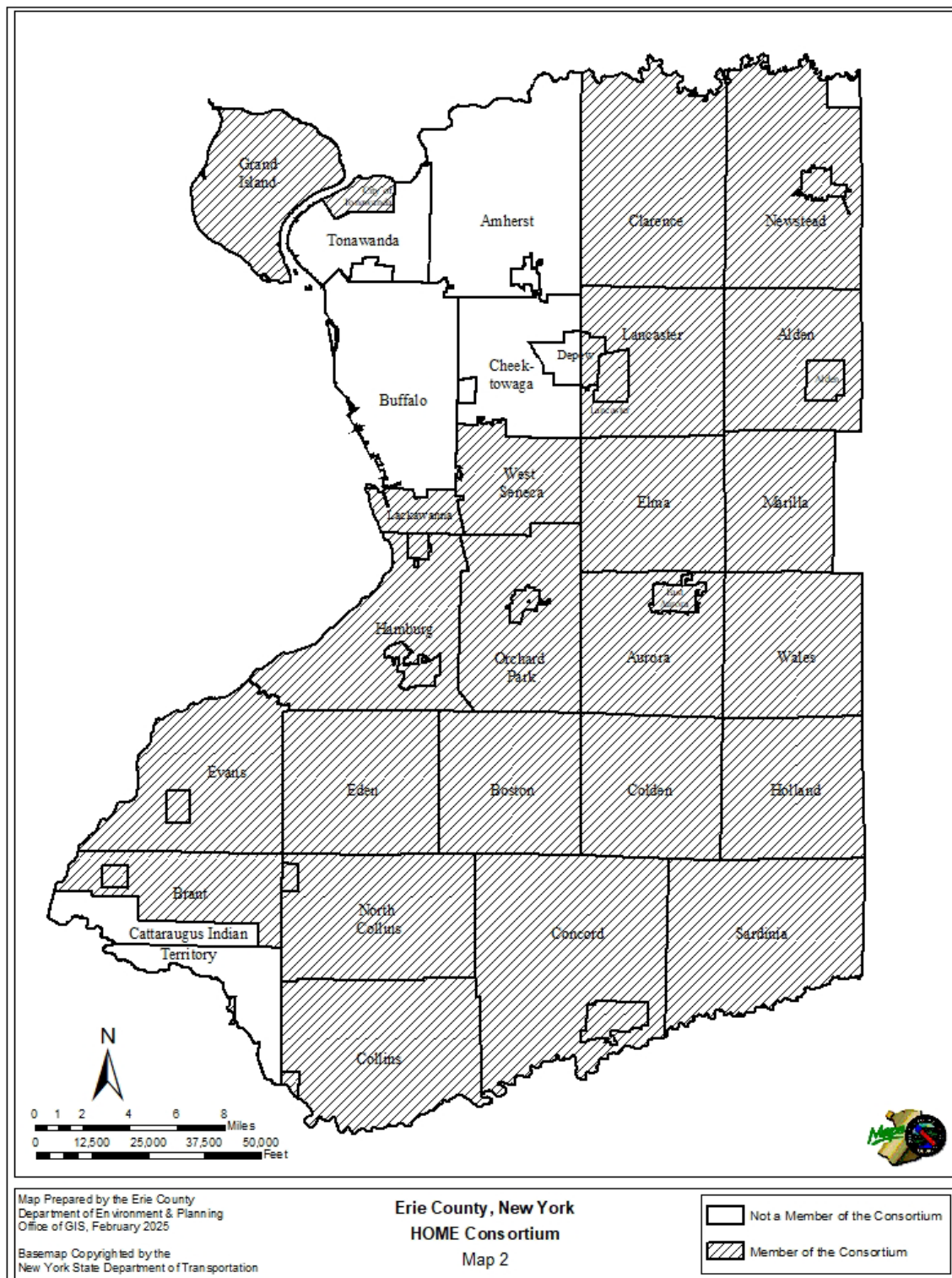
All comments or views were accepted.

### **7. Summary**

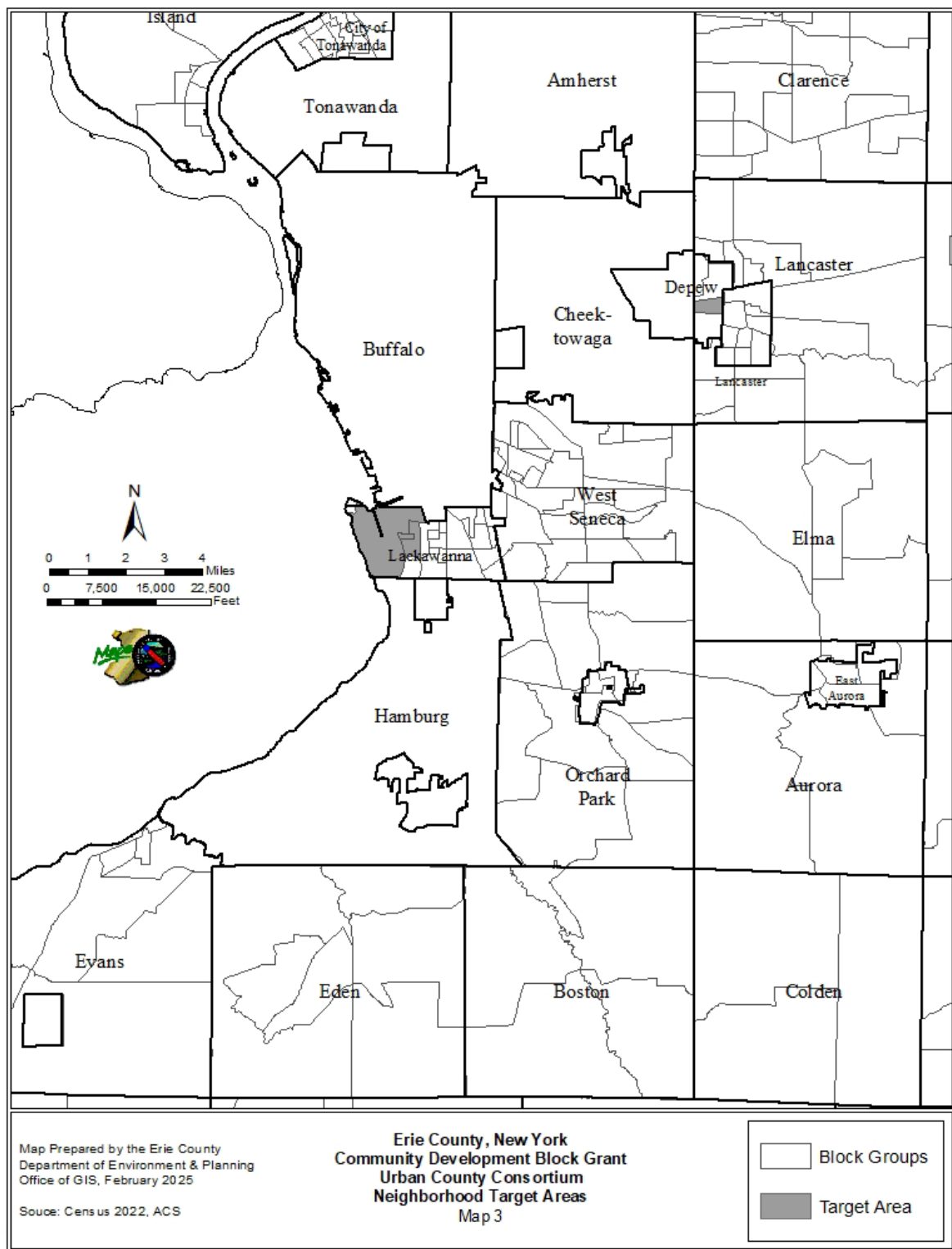
In summary, the Consolidated Plan and Annual Action Plan have been developed with community input and reflect the needs of the County.



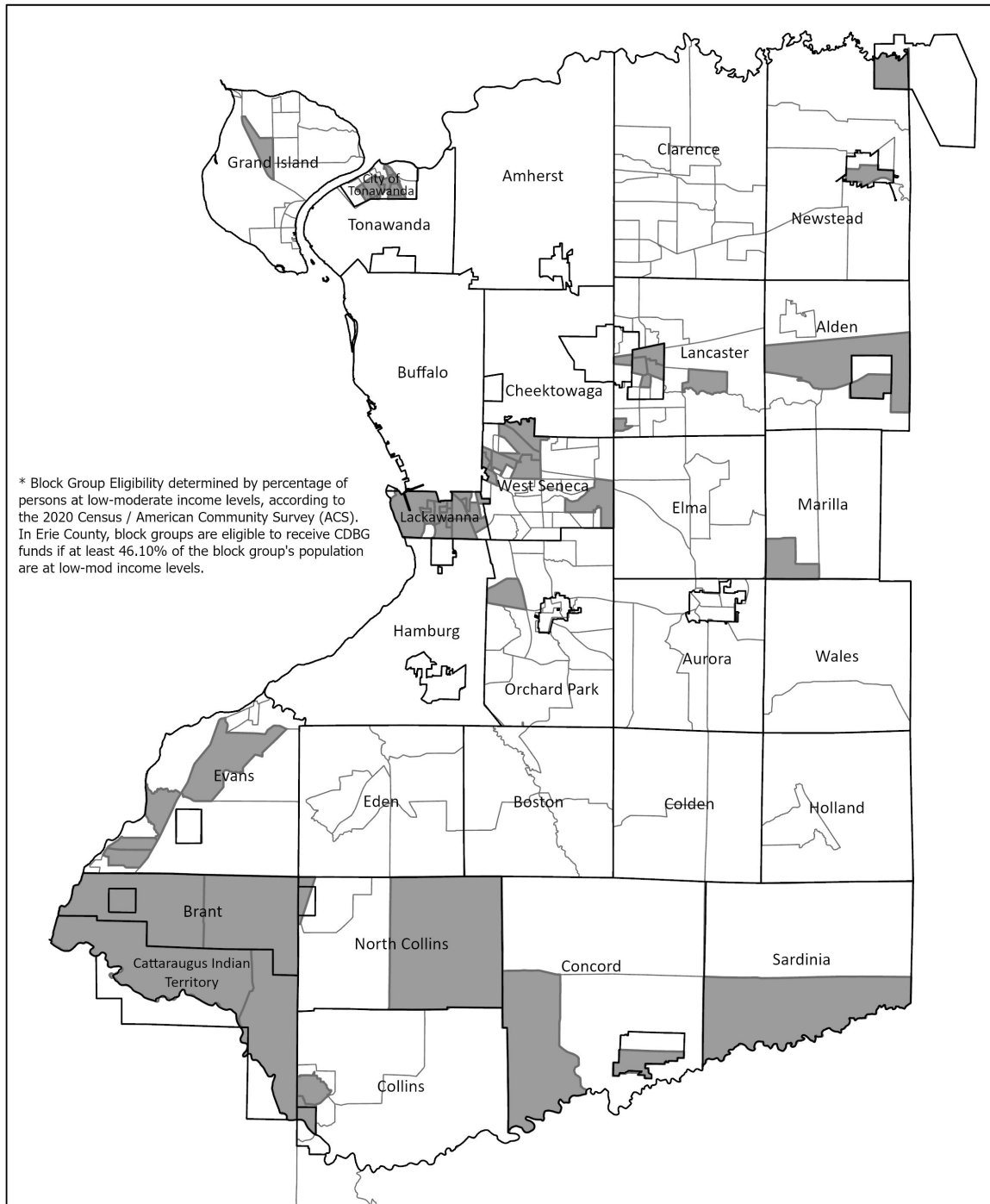
Map 1



**Map 2**



Map 3



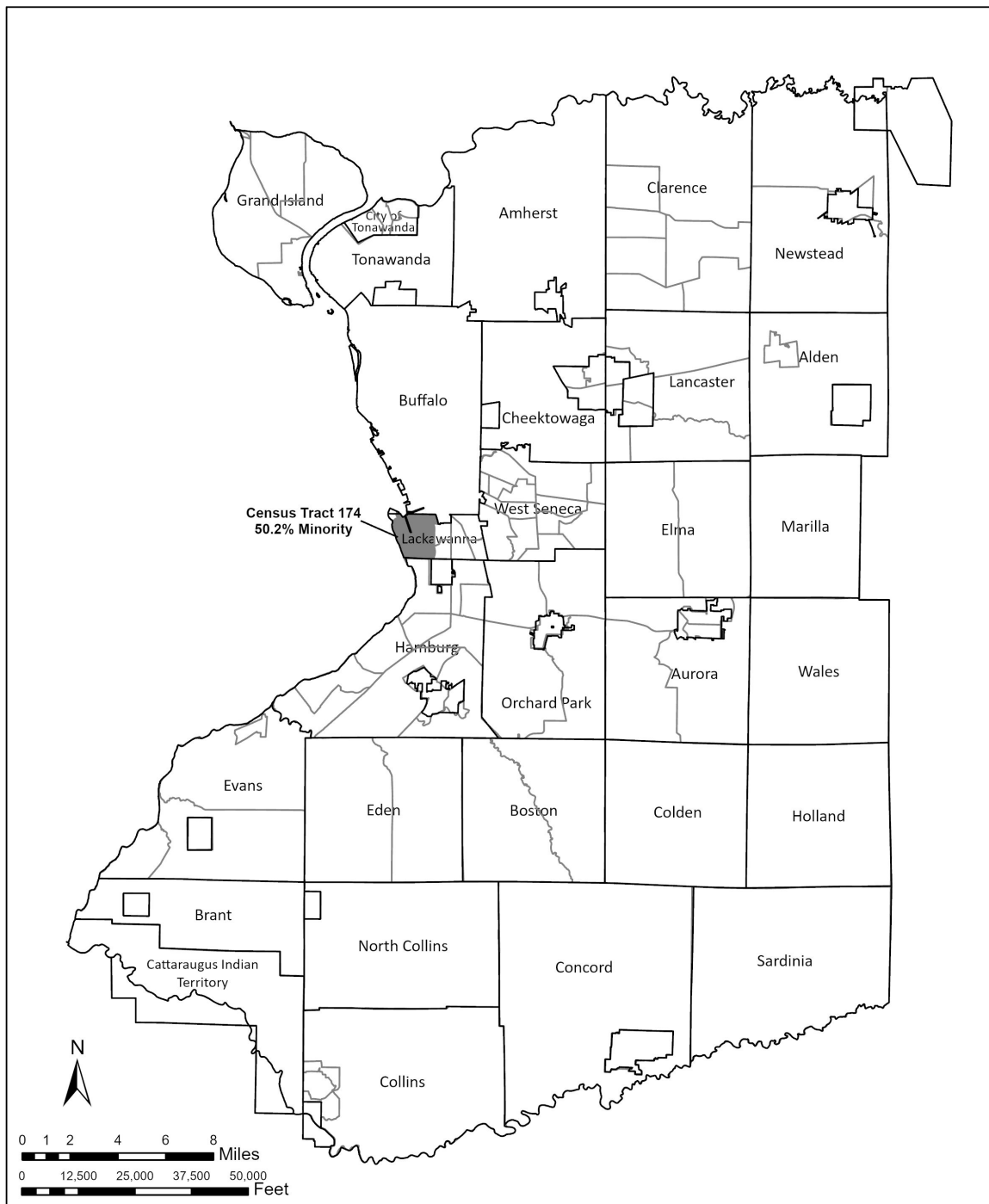
Map Prepared by the Erie County  
Department of Environment & Planning  
Office of GIS, February 2025

Source: HUD

Erie County, New York  
Urban County Consortium:  
2020 CDBG Eligible Block Groups  
Map 4

2020 CDBG Eligible Areas  
Ineligible Areas

Map 4



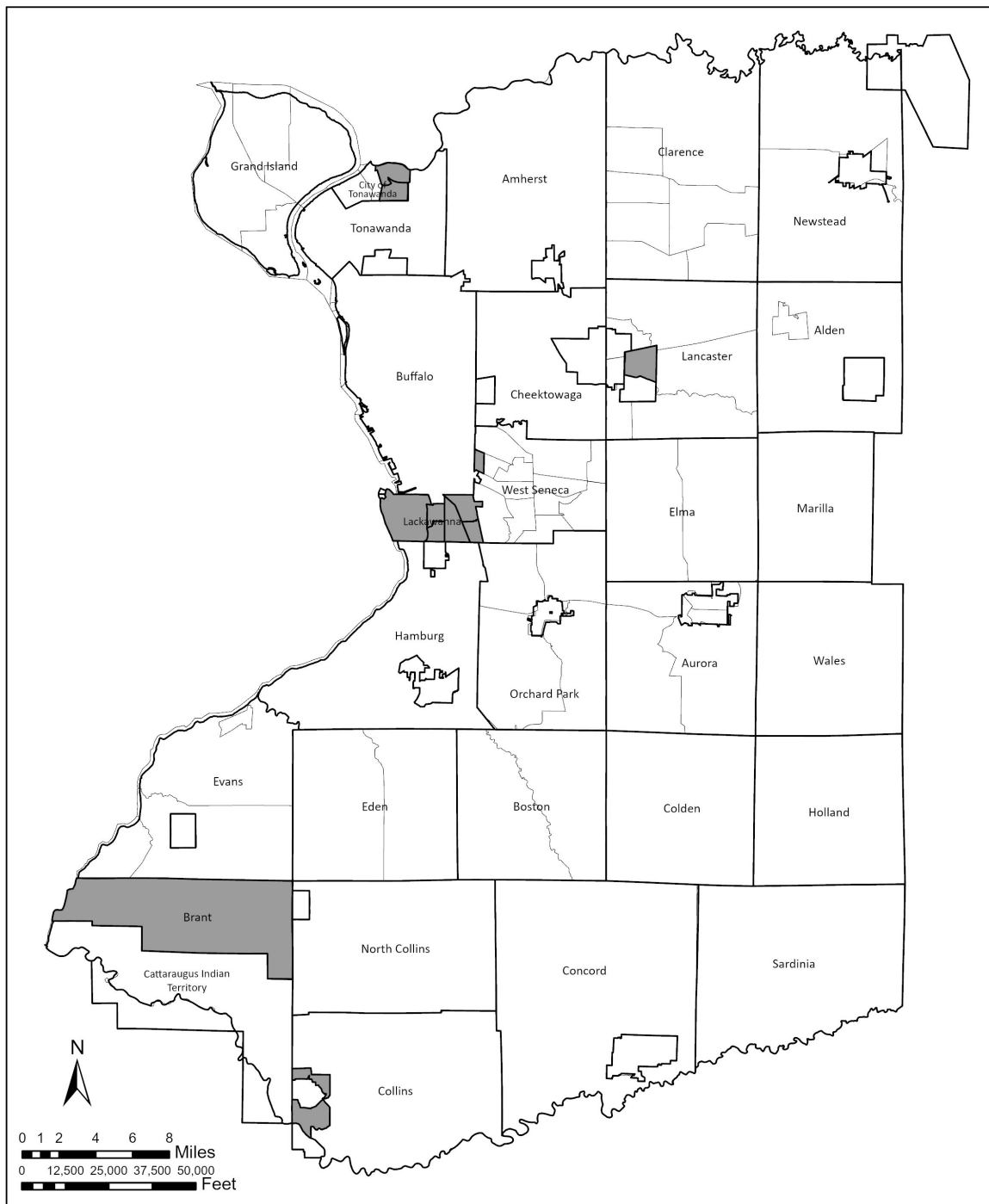
Map Prepared by the Erie County  
Department of Environment & Planning  
Office of GIS, February 2025

Source: 2020 Census Race and Ethnicity  
Characteristics

Erie County, New York  
Urban County Consortium:  
Census Tracts with Substantial  
Minority Population  
Map 5

Under 50% Minority  
Equal To or Greater Than 50% Minority

**Map 5**



Map Prepared by the Erie County  
Department of Environment & Planning  
Office of GIS, February 2025

Source: HUD

Erie County, New York  
Urban County Consortium:  
Census Tracts with High Concentration  
of Low Income Residents  
Map 6

Equal To or Greater Than  
51% Low Income  
Under 51% Low Income

**Map 6**

## The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	ERIE COUNTY	Environment & Planning
HOME Administrator	ERIE COUNTY	Environment & Planning
ESG Administrator	ERIE COUNTY	Environment & Planning

**Table 1 – Responsible Agencies**

### Narrative

The Erie County HOME Consortium is comprised of thirty-seven municipalities, while the Erie County Community Development Block Grant (CDBG) Consortium has thirty-four members. The Town of Hamburg and the two villages located therein are only members of the HOME entity. The Erie County Department of Environment and Planning (DEP) has been administering the Consortia since the late 1970s via three-year cooperation agreements. A memorandum of understanding co-signed by Erie County and member communities in 1998 is the guiding document that directs funding allocations and other administrative matters.

### Consolidated Plan Public Contact Information

Paul J. D'Orlando  
Principal Contract Monitor  
County of Erie  
Department of Environment & Planning  
County Office Building



## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The Erie County Community Development Block Grant (CDBG) Consortium, Amherst, Cheektowaga, and Tonawanda Consortium, and the City of Buffalo developed a single, extended public participation and consultation process for their respective Five-Year Consolidated Plans and Analysis of Impediments to Fair Housing. A coordinated outreach effort was developed to maximize input from a large cross section of stakeholders including citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care. Outreach initiatives primarily focused on stakeholder meetings, one-on-one and group interviews, and a community development needs survey submitted to municipal officials within the Consortium. These efforts ultimately helped shape the outcome of this plan.

**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)).**

During the final week of June 2024, Erie County held focus groups with a large cross section of stakeholders to discuss the Five-Year Consolidated Plan and funding priorities. The outreach effort further included public meetings, notices, interviews, and a community development needs survey. In addition, the DEP implements a range of affordable housing and community development activities, including administration of the CDBG, ESG and HOME programs; preparation of the Consolidated Plan (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.

The Consortia 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 DEP implements a range of affordable housing and community development activities, including administration of the CDBG, ESG and HOME programs; preparation of the Consolidated Plan (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. During the preparation of the CP, the Consortia consulted with many entities.

The primary role of private industry in Consortia activities are contractors to the housing rehabilitation cases undertaken annually as well as the community projects carried out with CDBG, ESG and HOME funding. Various commercial banks in the region are active participants in the affordable housing

delivery system and serve on Consortia project committees. Financial assistance through the banking community is often used to leverage CDBG and HOME dollars in constructing new senior housing projects.

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

**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**

Homeless Alliance of Western New York (HAWNY) is the NY508-Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC lead. Erie County and other CoC members under the leadership of HAWNY utilizes a coordinated entry system and standard assessment—Vulnerability Index-Service Prioritization Decision Assistance Tools (VI-SPDATs). Homelessness is less concentrated in the Erie Consortia municipalities, and there are no emergency shelters located within the Consortia, the county funded Rapid rehousing (RRH) program utilizes the coordinated entry system and coordinated with other RRH programs funded within the CoC to prioritize people within the consortia and serving those who are most in need. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability. The CoC Youth Taskforce focuses on creating community priorities to end youth homelessness. The annual Point in Time Count surveys the homeless to identify the number in need, demographic information, and the changing landscape. All information gathered is used to maintain a database of services utilized by the chronically homeless. These projects, sponsored by HAWNY, have produced an Annual Homeless Summary Brief and established goals that guide planning to end homelessness in the broader Erie County community. Among the priorities, the Plan 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. During the 2024 Point in Time Count there were 67 chronically homeless individuals identified within Erie County, which is a slight decrease from 2023 but higher than previous years. The high number of homeless individuals is because of higher utilization of Code Blue/emergency weather shelters and temporary shelters along with a reduced number of affordable apartments. We have continued prioritizing people who are most vulnerable and have the longest homeless history to prevent anyone becoming chronically homeless.

Two HUD-certified housing counseling agencies 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 Section 8 rental assistance program for all of Erie County (except for the 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 performance standards for activities funded under the County ESG Program were developed by the Homeless Alliance for WNY, the Continuum of Care (CoC). Staff for the CoC meets with local government staff and homeless service providers to determine the performance standards for the homeless rapid re-housing programs and the homelessness prevention programs that will be administered in the five-county service region. Many of these homeless service providers are active in the provision of transitional, supportive, and permanent housing for previously homeless individuals.

Erie County's Department of Environment & Planning (DEP) follows the CoC written standards, which details program policies and procedures, HMIS requirements, coordinated entry procedures and performance standards. The performance standards for activities funded under the County's ESG program were developed by the CoC. Staff for the CoC met with local government staff and homeless service providers to determine the performance standards for all programs including the homeless rapid re-housing programs and the homelessness prevention programs. Homeless Alliance of Western New York, the lead of the CoC and Homeless Management Information System (HMIS), administers the data collection and produce project and system performance quarterly.

HAWNY produces an Annual Homeless Summary Brief and Longitudinal System Analysis. DEP utilizes these reports along with the Annual Point In Time count to set up program priority and evaluate funded programs using the performance report.

Erie County Department of Environment and Planning, along with the CoC, will evaluate the outcomes of activities assisted by the County's ESG funds. Data collected from HAWNY's Homeless Management Information System (HMIS) will be used to determine if agencies funded with ESG funds are meeting their performance goals.

**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**

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

1	<b>Agency/Group/Organization</b>	Belmont Housing Resources for WNY, Inc.
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was consulted during a stakeholder meeting.
2	<b>Agency/Group/Organization</b>	City Mission Society Inc. dba Buffalo City Mission
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The agency was consulted during a stakeholder meeting.
3	<b>Agency/Group/Organization</b>	Buffalo Employment and Training Center
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
4	<b>Agency/Group/Organization</b>	BUFFALO ERIE NIAGARA LAND IMPROVEMENT CORP
	<b>Agency/Group/Organization Type</b>	Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
5	<b>Agency/Group/Organization</b>	Buffalo Municipal Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
6	<b>Agency/Group/Organization</b>	Center for Elder Law and Justice
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
7	<b>Agency/Group/Organization</b>	Compass House
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
8	<b>Agency/Group/Organization</b>	Erie County Department of Mental Health
	<b>Agency/Group/Organization Type</b>	Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

9	<b>Agency/Group/Organization</b>	Child and Family Services of Erie County
	<b>Agency/Group/Organization Type</b>	Services-Children Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
10	<b>Agency/Group/Organization</b>	Erie County Department of Social Services
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
11	<b>Agency/Group/Organization</b>	Family Justice Center of Erie County
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
12	<b>Agency/Group/Organization</b>	FeedMoreWNY, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
13	<b>Agency/Group/Organization</b>	Greater Buffalo-Niagara Regional Transportation Council
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
14	<b>Agency/Group/Organization</b>	Habitat for Humanity Buffalo
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
15	<b>Agency/Group/Organization</b>	Harvest House
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

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

There were no types of agencies that Erie County did not consult, either through stakeholder meetings, personal interviews and/or questionnaires.

### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Homeless Alliance of Western New York	
2024 Erie County Annual Action Plan	Erie County	Goals of the Strategic Plan relate to previous years efforts, adjusting based on previous outcomes to maximize benefit of CDBG, HOME, and ESG investments
2017 Erie County Broadband Feasibility Study	Erie County	The Strategic Plan advances the recommendations of the broadband study
ErieNet Business Plan Preliminary Draft (2022)	Erie County	The Strategic Plan advances the recommendations of the business plan
2023 Homelessness Summary Brief	Homeless Alliance of Western New York	The homelessness strategy in the Strategic Plan was developed consistent with the data presented within
Mid-Term Review for Opening Doors	Homeless Alliance of Western New York	The homelessness strategy within the Strategic Plan is consistent with the Continuum of Care recommendations
State of Housing and Homelessness in Buffalo 2024	City of Buffalo	The Strategic Plan advances the recommendations of the homelessness study
2024 Draft Analysis of Impediments to Fair Housing	Erie County	The current goals and strategies to overcome current barriers to fair housing are drawn from this plan
2022 - 2026 Erie County Comprehensive Economic Dev	Erie County Industrial Development Agency	The economic development strategy in the Strategic Plan is designed to align with and complement the CEDS at the local level

**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(l))**

The Erie County Consortium continues its collaborative efforts and partnerships with state and local government entities such as the Town of Hamburg, City of Buffalo, and the Towns of Amherst, Cheektowaga, and Tonawanda to ensure the complete implementation of the Consolidated Plan. Cooperation and coordination with other public entities is important as many of the initiatives that will be implemented, such as homelessness prevention and economic development initiatives, are regional in scope by nature.

**Narrative**

The Erie County Consortium continues to strive to include community agencies in the development and planning process for the Consolidated Plan and Action Plan implementation. The County has on-going efforts to increase coordination and consultation efforts in its planning processes.

## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The development of the Erie County Urban Consortium / Town of Hamburg 2025-2029 Consolidated Plan involved a variety of public outreach activities designed to gather public input and comment regarding implementation of CDBG, HOME and ESG Programs. The citizen participation process allowed the Consortium an opportunity to better inform the public of the purposes of these programs, the funding allocation process, and to be better aware of the needs of low-and moderate-income citizens.

In June 2024 Erie County staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation. More than 250 individual and organizational stakeholders were invited to participate in seven stakeholder meetings which included: Planning and Zoning and Municipal Officials, Public Housing Authorities, Community-based Organizations (CBOs) and Community Housing Development Organizations (CHDOs), Affordable and Special Needs Housing Organizations, Homeless Assistance Providers, Regional Agencies, Health and Human Services Agencies, Lead-Based Paint Agencies, Business Associations, Persons with Disability Advocacy Organizations, Persons with Limited English Proficiency Advocacy Organizations, Fair Housing Organizations, Non-profit Housing Owners, For-profit Housing Owners, Property Managers, Broadband Agencies, Resilience and Emergency Management Agencies, and Real Estate Developers.

Erie County also hosted four community forums in September 2024. Articles appeared in local and community newspapers informing the public about the forums and encouraging their participation. In addition, the 34 municipalities that make up the Erie County CDBG Consortium are required annually to advertise and hold public hearings. During September and October of 2024, each municipality held a public hearing in its community to obtain suggestions on projects that meet low/moderate income population needs, prevent slum and blight, and/or meet urgent community needs. The forums were used both to solicit information on needs and to provide information about the CDBG, HOME, and ESG programs, the type of projects eligible for funding, and the project selection process.

The public comment period on the Draft 2025-2029 Consolidated Plan will extend from January 10 to February 10, 2025. Public hearings were held on January 21, 22, and 23 to accept comments on the draft. All hearings were advertised in the Buffalo News and the Buffalo Criterion and posted on Erie County's website.

A summary table of all the meetings held during the 2025 action plan citizen participation process is included on the following page. 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 persons through the use of HUD federal grants and other public and private sector funds. See the Citizen Participation Appendix for all sign-in sheets, meeting summaries, comment sheets, and summary of community needs survey. Comments received were a part of the Needs Assessment and Market Analysis, and ultimately helped shape the outcome of the Plan's Five-Year Goals and Objectives.

An amendment to the Action Plan will be required if any project funding is added for either the CDBG, HOME, HOME ARP or ESG grants that is in excess of \$150,000. The citizen participation process will remain the same for the amendment as would be for the Action Plan.

Revolving Loan (RL) funds may be converted to Program Income (PI) funds each year for the purpose of drawing administrative funds from Program Income where the administrative expenses are no more than 20% of the combined RL and PI funds received in any given year.

Contingency Provision – It should be noted that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities indicated below.

a) CDBG Program

(1) Increase:

Twenty percent of any increase will be applied to planning and administration.

The balance will be applied to the Unprogrammed community projects listed in the order shown below:

- 1) V. Depew- \$150,000- Sidewalk Replacement
- 2) T. Evans– \$150,000- Wendt Park Improvements
- 3) T. Holland- \$150,000– Water Pump House Improvements
- 4) V. Lancaster- \$150,000- Pleasant Avenue Sewer Improvements
- 5) V. North Collins- \$150,000- Walnut, Kimble, Gurney Waterline Replacement
- 6) T. Orchard Park- \$49,898- Senior Van Purchase

(2) Decrease:

Twenty percent of any decrease will be applied to the planning and administration project.

The balance of any decrease will be applied to the CD Consortium Housing Rehab Program  
Targeted, Developing, Rural.

b) HOME/HOME ARP Investment Partnership

(1) Increase:

Ten percent of any increase will be applied to the HOME Administration project.

Fifteen percent will be applied to the Community Housing Development Opportunity set aside.

The balance will be applied to the HOME Housing Rehab Consortium or HOME ARP rental housing.

(2) Decrease:

Ten percent will be applied to the HOME Administration project.

Fifteen percent will be applied to the Community Housing Development Opportunity set aside.

The balance will be applied to the HOME Housing Rehab Consortium project or HOME ARP rental housing.

c) Emergency Solutions Grant Program (ESG)

(1) Increase:

7.5 percent will be applied to the ESG Administration project.

The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the increase for each reflecting the same percentage of the overall ESG allocation.

(2) Decrease:

7.5 percent will be applied to the ESG Administration project and the remaining amount will be decreased from each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the decrease for each reflecting the same percentage of the overall ESG allocation.

### 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	Stakeholder Meeting	Regional Agencies and Economic Development	A stakeholder meeting was held on June 25, 2024 at 10:00 am at the Delavan Grider Community Center. Representatives of nine agencies attended.	Municipal officials throughout the region must continue efforts to train for disaster preparedness. The natural and built infrastructure presents significant flooding risk and infrastructure investments are imperative.	All comments were accepted.	
2	Stakeholder Meeting	Homelessness and Special Needs Housing	A stakeholder meeting was held on June 25, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 26 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing capacity. Strengthen supportive services. Address regulatory issues that prevent shelters and affordable housing from being built.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Stakeholder Meeting	CHDOs and CBDOs	A stakeholder meeting was held on June 26, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Enhance community engagement. Encourage banks to be more supportive and flexible in their housing loan qualification process. Improve homebuyer training. Explore modular housing to address need for affordable and efficient housing solutions. Assess the financial impact of the 2027 electric mandate.	All comments were accepted.	
4	Stakeholder Meeting	Health and Human Services	A stakeholder meeting was held on June 26, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing in general as well as for DV victims. Address language barriers. Increase services for school age children. Increase funding to nonprofits. Address transportation needs.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Stakeholder Meeting	Housing Authorities, Developers, and Property Owners/Managers	A stakeholder meeting was held on June 27, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Increase shelter capacity. Develop transition programs. Enhance homebuyer education. Address affordable housing. Improve public housing sustainability. Strengthen supportive services. Monitor rental market. Enhance maintenance and security. Focus on needs of rural communities.	All comments were accepted.	
6	Stakeholder Meeting	Advocacy and Fair Housing Organizations	A stakeholder meeting was held on June 27, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Increase education programs on fair housing laws. Increase enforcement of fair housing laws. Address affordable housing.	All comments were accepted.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Stakeholder Meeting	Resilience and Emergency Management	A stakeholder meeting was held on June 28, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of three agencies attended.	Weatherization programs and emergency roof repair programs becoming increasingly important in response to weather volatilityNeed to continually support and grow warming and cooling stationsCoordination of agencies is imperativeInvest in improved connectivity through broadband investment	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Stakeholder Meeting	Municipal Officials	The Erie County Department of Environment and Planning solicited input from municipal officials within the Consortium via a community development needs surveys. 14 responses were received.	The community development needs identified via these surveys include the following: Affordable housing Housing rehabilitation for renters and owners Continued van service for seniors Accessible playgrounds Warming shelters and generators Drainage improvements Strengthening commercial corridors and downtowns	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Hearing	Non-targeted/broad community	Erie County hosted four community forums on 9/16/24 in the Town of Hamburg, on 9/17/24 in the Village of Depew 9/18/24 in the City of Lackawanna, and on 9/19/24 in the Village of North Collins.	Various public forums included following comments: Need for additional housing rehab Additional amenities for seniors, including fitness equipment. More funding for infrastructure in older neighborhoods. Sidewalk repair hard for mobility impaired seniors/residents to traverse poorly maintained sidewalks	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Public Meeting	Non-targeted/broad community	Each of the 34 municipalities that make up the Erie County Consortium held public hearings in September/October 2024 in their respective communities to obtain input from residents on community development needs	Additional funding for housing rehab programs for both owner-and renter-occupied units Support re-treering programs and grants help plant additional trees in older neighborhoods Funding for sidewalks many in disrepair Internet access, especially in rural communities Drainage and infrastructure project funding Need for more senior transportation Warming and cooling centers, especially in rural areas Help for handicapped residents to make improvements to homes	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Newspaper Ad	All community residents	Notice of availability of the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan for public review and comment was published in the Buffalo News and the Buffalo Criterion	No comments received.	N/A	
12	Stakeholder Meeting	All community residents	The FY 2025-FY 2029 Consolidated Plan and FY 2025 Annual Action Plan were posted on Erie County's website on January 3, 2025.	No comments received.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
13	Public Hearing	All community residents	Erie County held public hearings on January 21, 22, and 23, 2020 in the City of Lackawanna, the Town of Hamburg, and the City of Tonawanda, respectively, to present and obtain comments on the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan.	No comments received.	N/A	

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

Erie County's housing needs are complex and multifaceted, shaped by economic, demographic, and social factors. Over the past few decades, Erie County has faced various housing challenges, including a lack of affordable housing, an aging housing stock, and regional disparities in housing quality and availability. Addressing these issues requires a holistic approach involving government policies, community engagement, and investment in both urban and suburban areas.

Data sources for the following include: HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of American Community Survey (ACS) data from the Census Bureau, as well as 2016-2020 ACS 5-Year Estimates.

#### *Affordable Housing Shortage*

One of the most pressing housing needs in Erie County is the shortage of affordable housing. 49% of renters in Erie County and 34% of owners spend more than 30% of their income on housing, classifying them as "cost-burdened." The rising costs of rent and homeownership make it increasingly difficult for low- and middle-income families to secure stable housing. The demand for affordable rental units far outstrips supply, leading to increased competition and higher rents. This shortage also extends to the suburban areas, where affordable housing options are limited, contributing to housing instability and homelessness.

#### *Aging Housing Stock and Infrastructure*

Erie County's generally has an aging housing stock, particularly in the older suburbs and village centers. Many homes, built in the early-to-mid 20th century, need significant repairs and upgrades to meet modern standards of livability and energy efficiency. General housing condition in many of the older neighborhoods and rural areas tends to be poor, with issues such as lead paint, mold, and outdated plumbing or electrical systems fairly common. These factors disproportionately affect low-income households who cannot afford necessary repairs or upgrades. Furthermore, older homes are less energy-efficient, leading to higher utility costs for residents. Investment in the rehabilitation of existing housing stock is essential to improve living conditions and preserve the historical character of neighborhoods while addressing modern housing needs.

### *Homelessness and Housing Instability*

Homelessness remains a critical issue in Erie County, with individuals and families experiencing housing instability or living in temporary shelters. The lack of affordable housing and the shortage of supportive housing for people with disabilities, mental health issues, or substance use disorders exacerbate this problem. The COVID-19 pandemic further deepened housing instability, with many people facing job loss or reduced income, making it even harder to afford housing. The demand for emergency shelters, transitional housing, and supportive services has grown, highlighting the need for increased investment in programs that provide both short-term relief and long-term solutions to prevent homelessness.

To address Erie County's housing needs, several solutions should be prioritized. First, increasing the supply of affordable housing through new construction and the rehabilitation of existing properties should be a top priority. Government incentives, such as tax credits for affordable housing developers, can help spur this investment. Second, expanding rental assistance programs, like Section 8 vouchers, can provide immediate relief to households struggling to afford rent. Additionally, programs that offer financial literacy education and homeownership support can help families build wealth through property ownership.



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

### **Summary of Housing Needs**

Data in the tables in this section provided by HUD apply to the jurisdiction of the Erie County HOME Consortium. The 2020 estimate of population for the Consortium is 380,930 and represents about 42% of the County's population. County jurisdictions excluded from the Consortium include the City of Buffalo, which administers its own HOME program, and the Towns of Amherst, Cheektowaga and Tonawanda, which comprise a separate HOME Consortium. The Town of Hamburg is included in the County HOME Consortium and in the data presented here, although it is a separate entitlement jurisdiction under the CDBG program. Average household size within the County Consortium is 2.4 persons per household.

#### Low and Moderate-Income Renter/Owner Occupied Units

Owner-occupied households with income under 80% of the Area Median Income (AMI) totaled equals 27,443 units compared to 22,993 renter occupied units in the same income category. Overall renter households have a lower average income than homeowners and this is reflected in the percent of all renters, 84%, who are low-moderate income. However, 60% of owner-occupied households are currently low-moderate income, an increase from 25% in 2020.

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

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

Renter occupied units under 80% of the AMI and experiencing cost burden totaled 13,471, or 49% of all renter occupied units. This is a 6% increase in cost-burdened renter units from the last 2020-2024 Con Plan. Owner occupied units under 80% of the AMI and experiencing cost burden totaled 15,711 households, or 34% of all owner-occupied units. The proportional impact on renters was dramatically higher than for owners, with almost one in two being experience cost-burden.

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

Renter units occupied by elderly under 80% of the AMI and experiencing cost burden totaled 5,479, or 40% of all renter occupied units experiencing cost burden. Owner occupied units in the same subcategory totaled 8,174, or 52% of all owner-occupied units experiencing cost burden. Both renter- and owner-occupied elderly units increased dramatically from the last 2020-2024 Con Plan. The amount of renter elderly units with cost burden increased approximately 42%, and owner elderly units increased 10% from five years ago. The majority of homeowners in the Consortium communities who are cost-

burdened are elderly, a reflection of individuals aging in place within these communities and lacking more affordable options to downsize into

### Housing Problems

Housing problems are summarized by renter and owner households. Categories include: (1) Substandard Housing - Lacking complete plumbing or kitchen facilities, (2) Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing) (3) Overcrowded - With 1.01-1.5 people per room (4) Housing cost burden greater than 50% of income, and (5) Housing cost burden greater than 30% of income. Relatively few units were classified as substandard or severely overcrowded.

For 85.8% of low-moderate income renters and 91.9% of low-moderate income owners, the primary housing problem was having a housing cost burden which was in excess of 50% of income or a housing cost which was 30-50% of income.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	378,545	380,930	1%
Households	151,864	159,740	5%
Median Income	\$0.00	\$0.00	

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

### **Number of Households Table**

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	14,295	17,615	25,020	16,375	86,480
Small Family Households	2,299	3,395	6,549	5,428	44,485
Large Family Households	555	1,118	1,062	931	6,898
Household contains at least one person 62-74 years of age	3,876	4,106	7,237	4,401	21,850
Household contains at least one person age 75 or older	3,269	6,034	4,928	2,194	6,235
Households with one or more children 6 years old or younger	1,244	1,756	2,358	1,996	7,223

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS

Households living alone	Total		Male		Female	
Non-elderly	25,890	52.36%	13,747	66.00%	12,143	42.43%
Age 65 and over	23,556	47.64%	7,083	34.00%	16,473	57.57%
Total living alone	49,446	100.00%	20,830	100.00%	28,616	100.00%

**Table 12– Households Living Alone**

Source: 2022 ACS Five-Year Estimates

**Table 12 - Households living alone**

Total civilian noninstitutionalized population with a disability	49,149	12.9%
<b>By Age Group:</b>		
Under 5 Years of Age	146	0.3%
Age 5 to 17 Years	2,978	6.1%
Age 18 to 34 Years	5,709	11.6%
Age 35 to 64 Years	17,322	35.2%
Age 65 to 74 Years	9,093	18.5%
Age 75 Years and Over	13,901	28.3%
<b>Type of Disability (All ages)</b>		
With a hearing difficulty	15,027	30.6%
With a vision difficulty	7,294	14.8%
With a cognitive difficulty	17,187	35.0%
With an ambulatory difficulty	23,093	47.0%
With a self-care difficulty	9,367	19.1%
With an independent living difficulty	16,893	34.4%

**Table 13– 2020 Population with a Disability by Age and Type in the Erie County HOME Consortium**

Source: 2020 Decennial Census

**Table 13 - 2020 pop with disability**

	With a Disability	No Disability
Less than 50% of the poverty level	6.7%	2.6%
Less than 100% of the poverty level	16.2%	5.6%
Less than 125% of the poverty level	21.0%	8.2%

**Table 14 – 2022 Erie County HOME Consortium Poverty Status in the past 12 Months**

Sounds: 2022 ACS Five-Year Estimates

**Table 14 Poverty Status**

## Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	81	169	38	105	393	88	141	55	25	309
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	10	24	45	134	4	0	70	60	134
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	175	138	106	35	454	54	50	172	39	315
Housing cost burden greater than 50% of income (and none of the above problems)	4,000	1,607	289	55	5,951	4,491	2,673	1,195	150	8,509
Housing cost burden greater than 30% of income (and none of the above problems)	1,217	3,834	2,068	254	7,373	1,001	2,427	3,615	1,426	8,469

	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)	493	0	0	0	493	791	0	0	0	791

**Table 7 – Housing Problems Table**

Data 2016-2020 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	4,315	1,931	452	240	6,938	4,636	2,852	1,497	274	9,259
Having none of four housing problems	2,958	5,613	7,724	4,278	20,573	2,368	7,145	15,345	11,560	36,418
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

### Housing Problems 2 - Text

For renter households that had an income under 30% of Area Median Income, 62% of the households within that category had one or more of the four housing problems, which most likely included a housing expense greater than 50% of income. For owner households, the proportion was dramatically different, and down from the last Consolidated Plan when the rates for rental and owner were

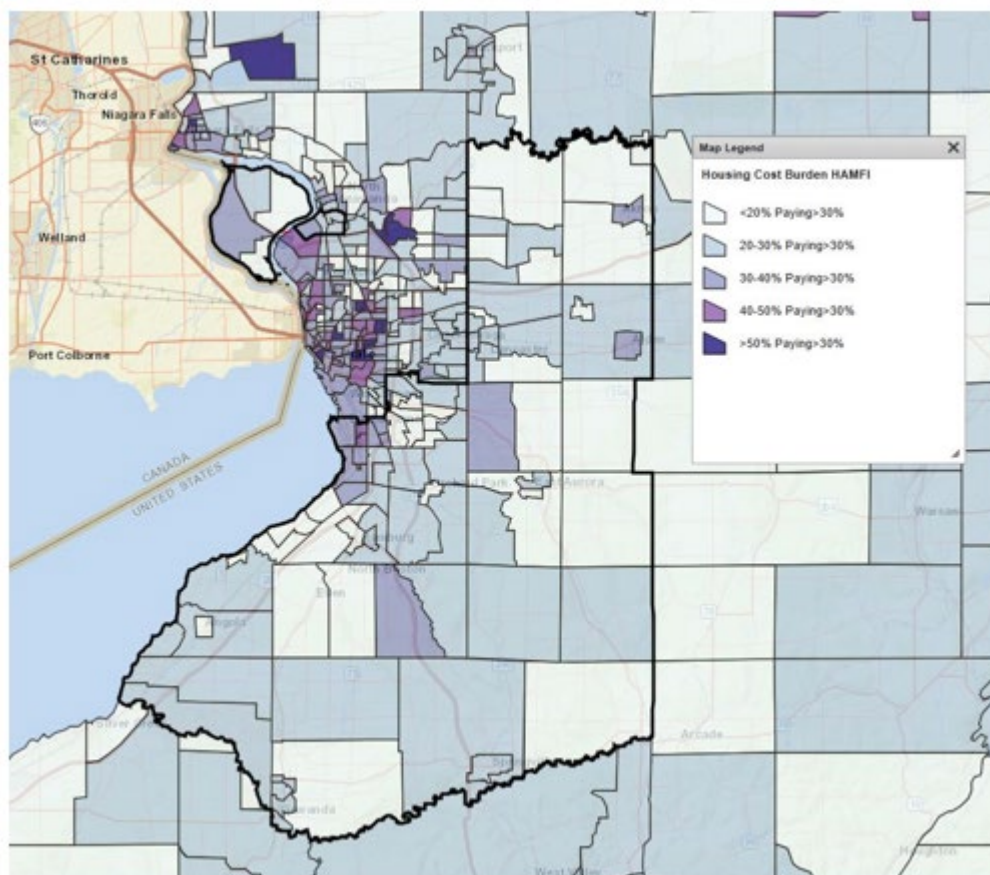
comparable, with 47% of the households within this income range likely paying more than 50% of income.

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,086	1,295	727	3,108	965	1,211	1,602	3,778
Large Related	313	254	93	660	191	282	247	720
Elderly	2,050	2,353	1,076	5,479	3,184	2,882	2,108	8,174
Other	2,060	1,666	498	4,224	1,246	821	972	3,039
Total need by income	5,509	5,568	2,394	13,471	5,586	5,196	4,929	15,711

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:



**Housing Cost Burden**

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	354	354	884	685	0	1,569
Large Related	0	0	0	0	161	218	4	383
Elderly	1,404	964	160	2,528	2,444	1,274	609	4,327
Other	0	1,773	391	2,164	1,046	0	0	1,046
Total need by income	1,404	2,737	905	5,046	4,535	2,177	613	7,325

**Table 10 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	195	133	126	35	489	58	40	242	75	415
Multiple, unrelated family households	15	15	0	0	30	0	10	0	24	34
Other, non-family households	20	0	4	45	69	0	0	0	0	0
Total need by income	230	148	130	80	588	58	50	242	99	449

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

Data 2016-2020 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:

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

According to ACS data, a total of 49,446 householders within the Erie County Consortium were living alone in 2022. That number accounted for 30.9% of all households within the Consortium. Compared with the last 2020-2024 Con Plan which stated 26% of all householders were living alone, it is evident that the trend of smaller household size is continuing within the consortium. Of the households living alone, 23,556 households, 47.64% are 65 or older. It can be assumed that most of these households have aged in place and continue to live in their owner residential units. Of those under age 65 most are between the ages of 35 and 64.

Many of these elderly households would be among the 13,653 low-moderate income elderly owner-occupied households of one or more persons who are paying 30% or more the income for housing as shown in Table 9. An undetermined number of these households would be single person elderly households. For such units that are in need of rehabilitation, County loan funds are available for eligible households to make needed repair.

It is reasonable to assume that a portion of that number are currently housed in existing assisted living housing resources. In terms of existing resources, Belmont Housing Resources lists an inventory of 51 assisted housing developments that contain 3,211 units designated for seniors. Also, Belmont Housing Resources estimates that two thirds of its 5500 voucher holders throughout the County are seniors. It can be assumed that a substantial proportion of these units are occupied by single person elderly households. Although information does not conclude that these resources address all the need of single person elderly households, these nevertheless are resources that most likely have been utilized to some degree.

### **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 2020 there were 49,149 persons living with a disability, comprising 12.9% of the total noninstitutionalized population. Of this population, 46.8% were 65 years and older. The most common disability status was ambulatory difficulty, which was experienced by 47.0% of the disabled population. Thirty-four percent, or 16,893 persons, expressed an independent living difficulty.

The supply of housing affordable and accessible to persons with physical disabilities is extremely limited. In addition to ensuring that the growing number of elderly households that include a person with a disability can be accommodated by appropriate housing stock, stakeholders expressed a need to provide assistance and supportive services that will allow seniors to age in place. This would include accessibility retrofitting, transportation improvements, and other actions needed to address a variety of other needs.

Within the Erie County HOME Consortium, 21.0% of persons with a disability also live below 125% of the poverty level, as compared with 8.2% of the population as a whole, underscoring the struggle that many



Erie County households that include a person with a disability experience in finding and maintaining suitable housing.

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

The most likely problem experienced by renter households continues to be cost burden in excess of 30% of income. In 2020, for low-moderate income renter households within the Erie County HOME Consortium, 13,471 were cost burdened, including 5,479 who were elderly. That's a 42.4% increase in the amount of elderly renters who are cost burdened from 2015. *In* 2020 for low-moderate-income owner-occupied households within the Erie County HOME Consortium, 15,711 were cost burdened, including 8,174 who were elderly. While that's a more modest 10.4% increase in the amount of elderly owners who are cost burdened from 2015, it's still notable that 52% of the owners who are cost burdened are elderly and there is a clear need to assist seniors aging in place.

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

The findings of the last Consolidated Plan showed that “Other” households – households that do not meet the definition of a “small related” household (2 to 4 persons, at least two of whom are related), “large related” household (5 or more persons, at least two of whom are related), or elderly household – were the most cost burdened and severely cost burdened category among renters, while elderly households were the most cost burdened and severely cost burdened owners.

Elderly individuals continue to represent the most cost burdened and severely cost burdened owners, and now also represent the most cost burdened and severely cost burdened renters.

There are 8,007 elderly renter households and 12,501 elderly owners paying more than 30% and 50% of income for housing costs.

### **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. Stakeholders report at risk populations would include incarcerated individuals released without housing, rural homeless populations that lack access to critical services, and those with alcohol or other drug addictions that need help dealing with addiction.

**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.

The Homeless Alliance of WNY notes in their ten-year plan, Opening Doors: Buffalo and Erie County Plan to End Homelessness that trends affecting homelessness including high levels of poverty, the distance between low-cost housing and employment opportunities, transportation, lack of affordable housing, and few or nonexistent homeless shelters in rural areas compared to their urban counterparts.

During the stakeholder meetings there were repeated mentions, across topic, of the lift on the eviction moratorium and the strain that is putting on low- and moderate-income individuals, as well as other at-risk or special populations. Stakeholders report at-risk populations in Erie County would include incarcerated individuals released without housing, rural homeless populations that lack access to critical services, those with disabilities including elderly disabled individuals, and those with alcohol or other drug addictions that need help dealing with addiction.

## **Discussion**

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

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

### Introduction

HUD defines a disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate over 10 percentage points more than that of corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Area Median Family Income (HAMFI) levels. Where the HUD table below reports AMI, they refer to HAMFI. Housing problems include the following: lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and cost burden greater than 30%.

### 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	11,178	3,089	0
White	9,603	2,852	0
Black / African American	329	15	0
Asian	85	0	0
American Indian, Alaska Native	169	115	0
Pacific Islander	0	0	0
Hispanic	352	38	0

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

**Data Source:** 2016-2020 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	11,083	6,519	0
White	10,398	6,159	0
Black / African American	240	65	0
Asian	29	15	0
American Indian, Alaska Native	98	107	0
Pacific Islander	0	0	0
Hispanic	210	154	0

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

Data Source: 2016-2020 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	7,630	17,399	0
White	7,206	16,084	0
Black / African American	190	238	0
Asian	23	100	0
American Indian, Alaska Native	19	133	0
Pacific Islander	10	0	0
Hispanic	123	479	0

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

Data Source: 2016-2020 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

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	2,186	14,173	0
White	2,122	13,643	0
Black / African American	0	68	0
Asian	54	70	0
American Indian, Alaska Native	0	88	0
Pacific Islander	15	0	0
Hispanic	0	147	0

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

Data Source: 2016-2020 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%

## Discussion

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

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

- Pacific Islander households earning 80%-100% of AMI. *Note, there are no housing problems shown for any other income range for the Pacific Islander population, and this sample size is quite small (24 households)*
- Hispanic households earning 30%-50% AMI

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

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

### Introduction

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

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,951	5,326	0
White	7,521	4,954	0
Black / African American	314	30	0
Asian	85	0	0
American Indian, Alaska Native	144	140	0
Pacific Islander	0	0	0
Hispanic	322	68	0

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

Data Source: 2016-2020 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	4,783	12,758	0

<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>
White	4,423	12,084	0
Black / African American	85	215	0
Asian	10	34	0
American Indian, Alaska Native	78	127	0
Pacific Islander	0	0	0
Hispanic	99	258	0

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

**Data Source:** 2016-2020 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**

<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	1,949	23,069	0
White	1,857	21,419	0
Black / African American	50	378	0
Asian	19	104	0
American Indian, Alaska Native	0	152	0
Pacific Islander	0	10	0
Hispanic	4	593	0

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

**Data Source:** 2016-2020 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

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	514	15,838	0
White	464	15,298	0
Black / African American	0	68	0
Asian	50	74	0
American Indian, Alaska Native	0	88	0
Pacific Islander	0	15	0
Hispanic	0	147	0

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

Data Source: 2016-2020 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%

## Discussion

HUD defines a disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate over 10 percentage points more than that of corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing severe housing problems by HUD Area Median Family Income (HAMFI) levels. Where the HUD table below report AMI, they refer to HAMFI. Housing problems include: lacks complete kitchen facilities, lacks complete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

There are no racial or ethnic groups experiencing a disproportionately greater housing need than the jurisdiction as a whole.



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

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

### Introduction

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

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	124,400	18,571	15,406	1,307
White	119,164	17,572	13,689	1,149
Black / African American	1,238	365	364	0
Asian	798	76	170	0
American Indian, Alaska Native	557	94	168	70
Pacific Islander	4	25	0	0
Hispanic	1,584	252	437	14

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

Data Source: 2016-2020 CHAS

### Discussion

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

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

- Black African/American households paying more than 50% of household income
- Pacific Islander households paying 30%-50% of household income

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

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

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

Housing need:

- Pacific Islander households earning 80%-100% of AMI. *Note, there are no housing problems shown for any other income range for the Pacific Islander population, and this sample size is quite small (24 households)*
- Hispanic households earning 30%-50% AMI

Cost Burden:

- Black African/American households paying more than 50% of household income
- Pacific Islander households paying 30%-50% of household income

There are no racial or ethnic groups experiencing a disproportionately greater housing need than the jurisdiction as a whole.

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

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

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

As the maps from HUD's CPDMaps system that are included in the Unique Appendices illustrate, racial and ethnic minorities in Erie County are concentrated primarily in the City of Buffalo but are also present with some degree of integration in other areas of the county, especially the northern half of the Consortium area. The communities within the Erie County Consortium are shown within a bold border on the maps. Census tracts that contain a percentage of Black residents higher than 15% include part of Lackawanna, downtown Gowanda, and the census tract within Alden where the Erie County Correctional Facility is located. A total of four census tracts have percentages of Hispanic residents greater than 5%. These include two in Hamburg, and one in Gowanda, Akron, and Alden respectively.

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.

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

### Introduction

Within the Consortium there are two public housing authorities – the Lackawanna Housing Authority (LHA) and the Tonawanda Housing Authority (THA). Operating within the City of Lackawanna, the LHA operates two federally funded family housing developments – Baker Homes and Glover Homes - which total 396 units and Parkview Towers, a 94-unit senior housing development. Operating within the City of Tonawanda, the THA administers three public housing developments, Colin Kelly, Arthur Albright, and Jacob J. Guzzetta Buildings, which contain a total of 214 family units and 50 senior units. Since public housing units operated by the Tonawanda Housing Authority are state funded rather than federal funded, there is no requirement to maintain data that is reported in the tables below for 491 federally assisted units operated by the Lackawanna Housing Authority.

The IDIS data on public housing appears unreliable so the bulk of this section relies on joint findings with the Analysis of Impediments to Fair Housing Choice and outreach to the public housing providers throughout Erie County and not limited to the Consortium. The presence of numbers from the Buffalo Municipal Housing Authority does skew the numbers, but what is abundantly clear is that there is tremendous demand for public housing in all of its forms and there is tremendous unmet demand.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	480	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	12,688	0	0	0	0	0
Average length of stay	0	0	9	0	0	0	0	0
Average Household size	0	0	2	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	123	0	0	0	0	0
# of Disabled Families	0	0	111	0	0	0	0	0
# of Families requesting accessibility features	0	0	480	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	164	0	0	0	0	0	0
Black/African American	0	0	314	0	0	0	0	0	0
Asian	0	0	0	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	79	0	0	0	0	0	0
Not Hispanic	0	0	401	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:**

The Lackawanna Housing Authority (LHA) has met the 5% requirement of ADA accessibility by providing sufficient accessible units in both Parkview Towers and Glover Gardens. Barker Homes received a waiver due to its age (constructed in 1937), but efforts continue to achieve maximum accessibility. The LHA has a waiting list of eight senior applicants, and none are considered disabled. The Tonawanda Housing Authority is a state aided project and does not have units meeting ADA standards at this time.

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

Housing Choice Vouchers (formerly Section 8) are managed in Erie County by three entities, Belmont Housing Resources, Rental Assistance Corporation of Buffalo (RAC), and the Buffalo Municipal Housing Authority. Vouchers from all providers can be used for housing throughout Erie County, offering flexibility and options for participants to find appropriate housing without geographic constraints.

Despite vouchers serving all of Erie County, a significant majority of vouchers are used within the City of Buffalo. This is because of a lack of available properties in other communities, especially those outside of the first ring suburbs and, of course, the City of Buffalo. All voucher providers are working to encourage landlords to accept vouchers and have raised rent allowances to provide more flexibility for participants. However, limited options remain for finding suitable housing in the suburban areas of the County.

There are currently more individuals on a waiting list for a housing choice voucher than there are active vouchers and the three waiting lists are currently closed.

*Buffalo Municipal Housing Authority*

The Buffalo Municipal Housing Authority opened its portal for families to apply for available vouchers in 2022. They had 3,547 applicants added to the waiting list and it is now closed until at least 2026. BMHA raised rent allowances between 10% and 12.7% depending on unit size to accommodate rising rents across the region. Vouchers can be used anywhere within Erie County. BMHA also put out a call for more landlords to accept vouchers to increase options for voucher recipients.

*Rental Assistance Corporation*

The waiting list for RAC was last open for one month from September to October 2019. At that time, applicants were placed on the waiting list via lottery with preference for those living, working, or with a job offer in Erie County.



### *Belmont Housing*

Belmont is not accepting new applications for its waiting list. The waiting list last opened in June 2024 and closed after only five days with 9,000 new individuals on the list. It is important to note that Housing Choice voucher applicants may be on more than one waiting list between the three providers. This may affect total numbers on the waiting lists and residents may receive assistance from one provider, thereby reducing the wait list for multiple providers.

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

The population at large includes many households that share the needs of public housing residents and voucher holders. Resources available to housing authorities and voucher administrators are insufficient to meet local needs. As noted above, voucher recipients are heavily concentrated in the City of Buffalo and a few inner ring suburbs. Despite efforts to provide location flexibility via higher payments, a lack of available units and continued discrimination from landlords limits options for residents in other communities. The Erie County Fair Housing law and ongoing efforts are focused on addressing this issue, but it will take time for results to be seen on the ground.

### **Discussion**

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

### Introduction:

The Homeless Alliance of Western New York (HAWNY) is the lead agency for both the Continuum of Care (CoC) and the Homeless Management Information System (HMIS) in the cities of Buffalo and Niagara Falls and Erie, Niagara, Genesee, Wyoming, and Orleans Counties. The HAWNY publishes reports of homelessness in the five-county region served. The information contained in the reports is obtained from HMIS, departments of social services, and providers. HMIS serves as the primary data source and nearly all agencies in the five-county area who are not on HMIS provide aggregate counts. Increased coverage of HMIS has led to an improved understanding of homelessness.

Additionally, HUD requires that every CoC conduct an annual Point in Time (PIT) count of the sheltered and unsheltered homeless in the CoC geographic area during the last ten days of January. Counts are further broken down into subpopulation categories including counts of persons who are chronically homeless, persons with severe mental illness, chronic substance abusers, Veterans, persons with HIV/AIDS, and victims of domestic violence. In Erie County, the January 2024 count located 909 households containing 1125 persons predominantly located in emergency shelter and transitional housing. These numbers represent a staggering post-pandemic jump from the 2019 numbers, with a 87% increase in the number of households and a 68% increase in the number of individuals experiencing homelessness.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 26 - Homeless Needs Assessment**

Data Source Comments:

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Total Number of Households	708	185	16	909
Total Number of Persons	846	263	16	1,125
Number of Children (under age 18)	118	68	0	186
Number of Persons (18-24)	70	52	0	122
Number of Persons (over age 24)	658	143	16	817

**Table 30– Households and Persons Homeless**

*Source: Homeless Alliance of Western New York – Point in Time Count 2024– Erie County*

**Table 30 Households and Persons Homeless**

	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Adults with a Serious Mental Illness	191	31	9	231
Adults with a <a href="#">Substance Use Disorder</a>	89	11	7	107
Adults with HIV/AIDS	8	0	2	10
Adult Survivors of Domestic Violence	90	53	0	143

**Table 31– Additional Homeless Populations**

*Source: Homeless Alliance of Western New York – Point in Time Count 2024– Erie County*

**Table 31 Additional Homeless Populations**

Indicate if the homeless population is: Partially Rural Homeless

### Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

**Table 27 - Homeless Needs Assessment**

Data Source Comments:

**For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:**

While homelessness in urban areas like Buffalo tends to receive more attention, rural communities often have fewer resources and a more dispersed

population, which makes it harder to track and address the issue, especially for the unsheltered population

Unsheltered homelessness in rural Erie County is often characterized by individuals or families living in cars, abandoned buildings, or temporary shelters such as tents. The isolation of rural areas increases the difficulty of accessing emergency services, and the lack of public transportation further exacerbates the problem. In winter, the harsh weather conditions pose significant risks to those without shelter, making transportation services and warming shelters important areas of focus.

**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):**

In 2023 Erie County saw a 9% reduction in Chronic Homelessness and a 10% decrease in Youth Homelessness. Additionally, the proportion of homeless individuals with a disability decreased year over year. Unfortunately, there was a concerning 16% increase in adults 62 years and over experiencing homelessness.

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

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

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

The 2024 Erie County PIT Count identified 306 individuals in 91 homeless families with children. This represents a 15% increase in homeless families as compared with the last 2020-2024 Con Plan. Of the individuals in families with children, 177 were under 18, 25 were between the ages of 18 and 24, and 104 were over the age of 24. These numbers are fairly stable in relation to homeless children, with the bulk of the increase being in adults over the age of 25. No families with children were unsheltered. Nine children only households were counted within emergency shelters and transitional housing. No data was available regarding families of veterans within Erie County.

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

HAWNY's 2023 Homelessness Summary Brief provided to Erie County indicates that the homeless population is shown to be predominantly Black or African-American (53.5 percent) and White (38.2 percent), while multiracial individuals accounted for 4.6 percent of all homeless persons. In contrast, the racial makeup of Erie County was 75.4 percent white and 12.9 percent Black or African American according to the 2020 Census. In addition to race, 20.4 percent of the homeless population counted identified their ethnicity as Hispanic/Latino. Few respondents identified as other racial ethnic groups.

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

According to the 2024 Point-in-Time Count, there were 1,109 sheltered homeless individuals (893 households) and 16 unsheltered homeless individuals (16 households) in Erie County. Of the sheltered homeless reported, 846 individuals (708 households) were counted in emergency shelters and 263

individuals (185 households) resided in transitional housing facilities. Households living in emergency shelters included 641 without children, 59 households with at least one adult and one child, and eight households with only children. Households living in transitional housing included 152 households without children, 32 households with at least one adult and one child, and one household with only children.

### **Discussion:**

While overall, Erie County has seen some positive movement in recent years regarding the number of homeless and chronic homeless individuals, there are two significant areas of concern identified by HAWNY:

- 1) Increasing homelessness among the elderly population
- 2) Increase in the number of homeless individuals citing eviction by a landlord

Demographic data in the Consortium shows both an increasing elderly population and increasing housing cost burden for elderly individuals that own and rent. This increased housing insecurity is likely a contributing factor to the increase in elderly homelessness. Additionally, stakeholders expressed significant concern for all age groups about how the lifting of the COVID eviction moratorium will impact low and moderate income low- and moderate-income individuals at risk of homelessness. It appears those fears are well-founded. These trends underscore the efforts to provide legal and fair housing services to low- and moderate-income individuals, and to provide resources to help seniors age in place.

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

### **Introduction**

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

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

#### Elderly

Comprising an estimated 20.8 % of the total population, addressing the needs of those ages 65 and over is a critical consideration in developing a suitable living environment within the communities of the Consortium. In addition, Census data from the American Community Survey (ACS) shows the Consortium is aging significantly, with increases of 18.6% % in the population ages 65-74, 17.8% in the population ages 75-84, and 2.4% in the population ages 85 and over between 2017 and 2022. Therefore, the Erie County Consortium is likely to face growing needs such as accessibility, affordable housing and healthcare as more community members reach this senior status.

Housing for the elderly population within the Consortium is characterized by primarily owner-occupied housing units, with 74.3% of the total housing units for the population 65 and older owner-occupied. In addition, at 50.8%, just over half the householders 65 and older in the Consortium live alone, whereas only 33% of the total householders in the Consortium live alone. Another important consideration for housing and accessibility is that 25.0% of the civilian noninstitutionalized population 65 and older have a disability status. This status may include hearing, vision, cognitive, ambulatory, self-care, or independent living difficulties. The most common disability status of those 65 years and over is ambulatory difficulty.

Economic data for the elderly population shows that there is a higher percentage of the 65 and older population living below the 100% poverty level than the total population, there is a higher percentage of 65 and older population living at 100 to 149% of the poverty level than the total population, and there is a lower percentage of 65 and older population living at or above 150% of the poverty level than the total population.

According to the 2022 ACS data, income in the past 12 months for the population 65 and older included social security for 92.3% of the population, retirement for 68.5% of the population and earnings for 33.4% of the population. Data for Erie County as a whole shows that the mean of earnings at \$94,440 is



substantially larger than that of the mean of social security income at \$22,454 or the mean of retirement income at \$27,959. Based on this poverty level data and income data, there is a need for affordability considerations for the elderly population.

#### Persons with mental, physical, and/or developmental disabilities

In 2020 there were 49,149 people living with a disability in the Erie County HOME Consortium, comprising 13.0% of the total civilian noninstitutionalized population. Of this population, 46.8% were 65 years and older. The most common disability status was ambulatory difficulty.

Economic characteristics of the population with a disability include a larger percentage of the population that is below 50% of the poverty level, below 100% of the poverty level or below 125% of the poverty level than that of the population with no disability.

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

The housing and supportive service needs of the populations described in this section were discussed during stakeholder meetings for the Consolidated Plan. In the Health and Human Services meeting, key issues identified included limited housing, coordination of services, staffing challenges, cultural and language sensitivity, transportation barriers, housing affordability and quality, prevention services, and the removal of obstacles to assistance. Additional concerns included education for youth, childcare, senior housing and services, and the intersection of employment, housing, and transportation. The following summary provides an overview of the needs discussed.

- **Increased Housing Opportunities:** There is a specific need for additional housing for the elderly and persons with disabilities. In addition to a shortage of housing for special needs population, there are significant challenges finding quality, affordable units.
- **Behavioral Health Services:** The elderly population across the county was identified as having increasing mental health needs, particularly in the wake of COVID-19.
- **Service Coordination:** A need for improved coordination of services, especially for transitional housing, was highlighted. Stakeholders emphasized the importance of supporting individuals holistically, rather than focusing solely on specific disorders, by providing coordinated services tailored to individual needs.
- **Transportation Issues:** Transportation barriers were identified as a significant issue for various populations, preventing them from accessing essential services. The elderly and workers with nontraditional hours or remote job locations are disproportionately impacted by transportation barriers.

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

The Eligible Metropolitan Statistical Area (EMSA) in Erie County, reflects the broader population trends in New York State, which has seen a significant number of individuals living with HIV/AIDS. In Erie County, the estimated number of people living with HIV/AIDS (PLWHA) hovers around 3,000, though the exact figure can vary due to ongoing testing, treatment, and reporting practices.

HIV/AIDS disproportionately affects certain groups, particularly men who have sex with men (MSM), individuals from racial and ethnic minorities, and people who inject drugs. Among this population, the majority are male, with a notable proportion of African American and Hispanic individuals. The disease burden also affects women, although at lower rates. According to recent data from the Erie County Department of Health, the HIV epidemic is closely tied to socioeconomic factors, including poverty, limited access to healthcare, and lack of awareness about prevention and treatment.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

**Discussion:**

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

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

CDBG funds can be used for the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood amenities (such as educational centers, parks, recreation centers, and libraries) and facilities serving special needs populations (such as homeless shelters, senior centers, or facilities for people with disabilities).

The need for public facilities and improvements in these facilities is often identified at the local community level. Erie County operates county-wide systems to deliver health and social services, with community centers—typically managed by municipalities—serving as the primary access points for these services. Additionally, Erie County runs a county-wide library system that provides staffing, furnishings, and books to municipal library facilities. Many rural libraries, often repurposed from former stores or residential buildings, need to be expanded or replaced to meet the needs of growing populations and evolving technologies. The County park system is insufficient to meet all local recreational needs; therefore, municipal parks, located near population centers or hamlets, are essential and require improvements or expansion.

Several accessibility upgrades have been proposed by Consortium communities through both the Community Development Needs Survey and the Municipal Representatives meeting. Many community facilities—such as fire stations, community and senior centers, and park and recreation areas—are inadequate in size and condition. Some of these facilities still require physical improvements to better accommodate individuals with disabilities or elderly persons.

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

Erie County facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. The County also conducted a community development needs survey of municipal officials within the CDBG Consortium. The County then facilitated a centrally located Municipal Officials meeting where the survey results were reviewed and discussed, followed by a discussion that provided additional feedback relative to each community's needs.

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

Historically, the Erie County Consolidated Plan has focused on the need for public improvements by separating those needs for “Developed Areas”, “Developing Areas”, and “Rural Hamlet”. Due to the extensive needs and the relatively modest amount of funding, many of the needs continue to exist as the Consortium works to mitigate problems and prioritize investments throughout a large and varied geography. In both developed, developing, and rural areas, there is a need for coordinating

infrastructure projects with the potential to support the construction of affordable housing or to assist with the retention or creation of employment opportunities for low-income Consortium residents.

#### Developed Area Needs

- Aging and inadequate infrastructure including sanitary sewer and storm drainage collection systems, some of which are still of the old combination sanitary-storm sewer type, and water distribution lines which are in need of replacement
- Space needs to be renovated and enhanced to provide warming and cooling shelters
- Deteriorating residential areas containing housing with code violations and scattered instances of blight
- Inadequate streets and sidewalks in poor surface condition, crumbling curbs in need of replacement and redesign to facilitate mobility of the handicapped and elderly
- Inadequate community facilities in need of renovation or replacement. Lack of parks and recreation facilities or parks in need of major rehabilitation
- Declining commercial facilities in the neighborhood, empty stores and lack of local employment opportunities especially for low- and moderate-income persons
- Inadequate flood protection measures with resultant frequent property damage due to lack of protective structures and/or inadequate channel capacity due to siltation and overgrowth

#### Developing Area Needs

- Aging and inadequate infrastructure which in some cases was poorly designed and constructed by developers and in other instances non-existent (e.g. the use of septic systems for sanitary waste disposal avoided the need for sewers; private wells supplying water rather than a water distribution system). Some soil conditions in the County cannot support septic systems, or such systems have ceased to function properly, necessitating sanitary sewers and treatment plants
- Space needs to be renovated and enhanced to provide warming and cooling shelters
- Wells have suffered a decline in water quality from the pollution of the ground water, making some water supplies unfit to drink. The installation of new water lines and sewers may also impact low and moderate residents who may have to pay for tapping into these lines, and/or increased utility taxes with already stretched budgets

#### Rural Hamlet Needs

- Lack of neighborhood facilities to serve the population
- Space needs to be renovated and enhanced to provide warming and cooling shelters
- Poor surface conditions on roads continue to be a problem on roads that were initially designed for farm use. Design improvements are required for ongoing road reconstruction
- Abandoned or under-utilized buildings need to be renovated or demolished

- Commercial activities in Rural Hamlets remain essential for many low-income rural residents. Rural infrastructure investments to leverage new investment should be focused within the small commercial centers to improve business viability and service delivery
- Ongoing need for viable transportation alternatives that are unique and best suited to cover larger geographies

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

Erie County facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. The County also conducted a community development needs survey of municipal officials within the CDBG Consortium. The County then facilitated a centrally located Municipal Officials meeting where the survey results were reviewed and discussed, followed by a discussion that provided additional feedback relative to each community's needs. The Public Infrastructure needs far outpaced all other categories and remained consistent with the needs identified in recent Consolidated Plans.

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

Much of the discussion at the stakeholder meetings focused less on the quality of public services being provided and more on the coordination of services and the delivery of services. Health and human services are needed for the low-income population, especially in the rural areas, and improved transportation infrastructure and additional locations were cited as needs in order to improve the health and human service delivery systems. Satellite health clinics were specifically referenced as were youth and senior services.

For the second Consolidated Planning process in a row, multiple Municipal representatives noted a need for the introduction or expansion of Rural Transit van use; however, volunteer drivers are in short supply for new routes.

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

Erie County facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. The County also conducted a community development needs survey of municipal officials within the CDBG Consortium. The County then facilitated a centrally located Municipal Officials meeting where the survey results were reviewed and discussed, followed by a discussion that provided additional feedback relative to each community's needs.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The Erie County HOME Consortium comprises the 34 CDBG Consortium municipalities and the Town of Hamburg and its two villages—the Villages of Hamburg and Blasdell. Both the statistics and the stakeholder contributions paint a bleak picture of the housing market within the Consortium and the region.

COVID-19 led to an increase in costs due to disruptions in the supply chain that increased the price of building materials, a shortage of labor and resulting increase in labor costs, and post-pandemic increases in interest rates and therefore increased financing costs for developers bringing new housing units to market. As a result, fewer units were being built and the costs for existing units have increased significantly.

The housing shortage and associated increase in housing prices is being seen at all levels of affordability but as many are getting priced out of market rate homes, the downward market pressure on affordable housing is where the market is under the most stress. Additionally, the recent lifting of the eviction moratorium has put a number of residents throughout the Consortium at high risk of displacement. In June of this year, Belmont Housing opened up the wait list for Section 8 housing vouchers for the first time since 2011 and within five days had 9,000 individuals on the waiting list.

The Consortium will continue to allocate funding for owner-occupied and rental unit rehabilitation programs, with priority funding targeted toward seniors, emergencies, and those located within designated target areas. Priority housing target areas exist within the City of Lackawanna, City of Tonawanda, and Town of West Seneca, and Town of Evans Lake Erie Beach neighborhoods. Priority funding for housing improvement and infrastructure improvements are tied to these target areas.

Existing County rehabilitation programs will continue to test all pre-1978 built homes for lead-based paint hazards. Approximately 78% percent of the housing units rehabilitated under the County program in 2023 tested positive for lead-based paint hazards and remedial action was required. Also, new as of 2024, all houses receiving federal assistance that are located within high-radon designated municipalities (as reported by NYS Department of Health) are tested for the presence of radon. Any homes that are above the HUD limit are required to have radon mitigation systems installed.

Most of the data in this market analysis is from either 2020 CHAS or 2022 ACS, and stakeholders have made it clear that the housing market has gotten even tighter and more expensive in the last two years. Most of the data does not yet reflect the impacts of increased interest rates and financing costs. All told, it is imperative that the Consortium continue to prioritize housing through leveraging investment to

create new affordable units and housing geared toward special populations and through ongoing housing rehabilitation efforts to enable resident to remain in their existing housing.

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

### Introduction

Most of the data in this market analysis is from either 2020 CHAS or 2022 ACS, and stakeholders have made it clear that the housing market has gotten even tighter and more expensive in the last two years. Most of the data does not yet reflect the impacts of increased interest rates and financing costs. All told, it is imperative that the Consortium continue to prioritize housing through leveraging investment to create new affordable units and housing geared toward special populations and through ongoing housing rehabilitation efforts to enable resident to remain in their existing housing. The housing market within the HOME Consortium consists of more mature suburban towns nearest to the City of Buffalo, with many residents commuting into the City. The Consortium also includes a number of exurban rural towns, especially in the southern part of the County.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	122,770	72%
1-unit, attached structure	4,973	3%
2-4 units	20,748	12%
5-19 units	11,294	7%
20 or more units	5,355	3%
Mobile Home, boat, RV, van, etc	4,242	3%
<b>Total</b>	<b>169,382</b>	<b>100%</b>

**Table 28 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Housing Units - Additional Text

ACS estimates for 2016-2020 indicate that single family units, detached or attached, represent 75% of the residential units within the Consortium. Two to four units structures, often doubles, represent 12% of the residential housing inventory. Only 10% of the inventory represent multi-family unit structures consisting of 5 or more units.

Mobile homes, RVs, etc. represent only 3% of the structures.

Of the 159,726 occupied units, 76.7% are owner occupied and 23.3% are renter occupied. As tabulated from Table 37, 16,649 of all occupied units are in structures with 5 or more units. All of these units would be occupied by renters and represent 44.8% of all renters with the Erie HOME Consortium. The remaining three-fifths of the renters, 20,542, would be residing primarily in 2-4-unit structures, most likely, and single-family structures on a more limited basis.



Not surprisingly, 83% of the owner-occupied units contained three or more bedrooms. One-quarter of the renter units contained three or more bedrooms.

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	214	0%	878	2%
1 bedroom	1,592	1%	8,688	23%
2 bedrooms	18,835	15%	18,860	51%
3 or more bedrooms	101,894	83%	8,765	24%
<b>Total</b>	<b>122,535</b>	<b>99%</b>	<b>37,191</b>	<b>100%</b>

**Table 29 – Unit Size by Tenure**

Data Source: 2016-2020 ACS

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

Through the use of CDBG Funds and the HOME Investment Partnership funds, Erie County DEP administers housing programs to assist LMI families to better afford housing. The CDBG Consortium currently has five target areas for housing rehabilitation and improvements – the First and Second Ward of the City of Lackawanna, the Main St. Revitalization area of the Village of Depew and the Lake Area Beach Target Area in the Town of Evans which have been target areas for an extended period of time and the, City of Tonawanda neighborhood and West Seneca Target Areas which were added in 2018. In 2023, 14% of Consortium expenditures took place in the Lackawanna Target area and 9% took place in the Village of Depew target area.

Belmont Housing Resources maintains an inventory list of assisted housing projects within Erie County. Within the Erie HOME Consortium there are 55 housing developments which contain 3,013 units. Forty-nine housing developments with 2,721 units are for seniors, five developments with 283 units are for families and one development with 261 units, all one- and two-bedroom units, is for families and seniors. In most housing developments, LMI limits apply and rents are based on 30% of income. A minority of housing developments have structured below market rents.

Section 8 vouchers in Erie County are administered by two agencies. Belmont Housing Resources, administers approximately 5,400 vouchers and the Rental Assistance Corporation (RAC), operational in the City of Buffalo, administers about 5,200 vouchers. Each voucher recipient may choose where they want to live. Currently an estimated 74% of voucher holders are seeking housing. In June of 2024 Belmont opened the waiting list for five (5) days and in that time nearly 9,000 individuals got on the list.

The Lackawanna Housing Development Corporation (LHDC) continues its commitment to building and operating various types of housing for LMI owners and renters. Over 60 single family units have now

been constructed within the First Ward of Lackawanna, a targeted area of the City. Further, Erie County, through its HOME funds, has constructed 8 new single-family homes within the First Ward. Four of these homes were sold to first-time homebuyers, and the other four were rental units. Also, four more in-fill lots are underway for 2025 and will come on-line in the near future.

The Southtowns Rural Preservation Corporation (SRPC) services the ten most southern towns in the County, including five villages. The population of these towns represents approximately 20% of the population of the Consortium. Since 1990, SRPC has been administering its Affordable Home Repair program for repairs that are needed to make properties livable. Grants have been available to low/mod homeowners for up to \$10,000 and now increased to \$15,000 with the 2019 grant. On average 12 to 15 grants are made each year. In 2019, a new grant program was implemented for immediate threat emergency grants for up to \$10,000 for low/mod senior homeowners.

The USDA Rural Development Office located in Batavia offers several housing programs. Eligible geographic areas within the Consortium include the area east of Transit Road (except for the Village of Depew and Lancaster), most of Orchard Park, The Town of Hamburg south of the Village of Hamburg, and the remainder of southern Erie County. Among its programs, the USDA offers a Section 504 single family home repair program to assist very low-income homeowners. Funds may be used to repair, improve or modernize a home, or to remove health or safety hazards to make properties accessible to household members with disabilities. Loans are available for up to 20 years at a 1% interest rate.

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

The National Housing Trust maintains a database on expiring project-based rental assistance (PBRA) units, which includes project-based Section 8, Section 202, Section 811, RAP, LIHTC, and HOME units. According to this database, a total of 208 project-based Section 8 rental assisted units located within the Erie County HOME Consortium will expire over the next five years.

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

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

No. Like most other areas in the nation, the HOME Consortium continues to experience a significant shortage of affordable and available housing. One critical indicator is the experience of Belmont Housing Resources and the Rental Assistance Corporation (RAC) who each administer Section 8 vouchers. Currently, between them they administer about 10,800 vouchers. Belmont reports that 22.5% of the vouchers are currently unused due to a lack of placement due to a combination of limited stock and landlords having more non-voucher apartment-seekers than ever. In the stakeholder meetings, it was

repeatedly pointed out that many landlords will avoid taking tenants with vouchers if they can. This is especially stark considering that in June of 2024 Belmont opened the waiting list for five (5) days and in that time nearly 9,000 individuals got on the list.

In addition, with rising rents in the private market and no subsequent increase in voucher funding to keep up, it is expected that upon turnover of voucher holders, there will be a gradual erosion of the number of vouchers that can be funded.

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

At stakeholder meetings, there were several comments citing a shortage of units at all levels of affordability. A disproportionate amount of new housing coming on-line is market rate or luxury homes and apartments, as that is where the best profit margins exist for the developers. That said, even the high-end market is seeing a shortage that increases prices as evidenced by the Buffalo Niagara Association of Realtor's findings that the average at or above market home is listed for less than a month and, almost 40% of the time is selling at or above the asking price.

The housing shortage and increasing construction and finance costs puts specific pressure on affordable housing and housing for seniors and at-risk populations. As people are priced out of the market, they begin to overpay for lower price options, creating a domino effect that leaves low- and moderate-income individuals, the elderly, and individuals with special needs without affordable options. Stakeholders indicated that landlords are now more likely than ever to find reasons to turn down housing vouchers in order to enter into market leases.

### **Discussion**

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

### Introduction

Within the Consortium, the towns nearest to the City of Buffalo are mature suburbs with many households commuting into the City. The Consortium is also comprised of exurban towns and a significant amount of rural land in the southern part of Erie County. As shown below, wages have not adequately kept up with housing costs in the Consortium and the precipitous increase in costs related to both housing value and contract rent.

### Cost of Housing

	Base Year: 2017	Most Recent Year: 2022	% Change
Median Home Value	139,900	197,400	41%
Median Contract Rent	637	849	33%

Table 30 – Cost of Housing

Alternate Data Source Name:

2017, 2022 ACS Data

Data Source Comments:

Rent Paid	Number	%
Less than \$500	8,212	0.0%
\$500-999	21,245	0.0%
\$1,000-1,499	5,867	0.0%
\$1,500-1,999	1,208	0.0%
\$2,000 or more	573	0.0%
<b>Total</b>	<b>37,105</b>	<b>0.0%</b>

Table 31 - Rent Paid

Data Source Comments:

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	2,571	No Data
50% HAMFI	10,661	8,469
80% HAMFI	22,191	27,464
100% HAMFI	No Data	40,654
<b>Total</b>	<b>35,423</b>	<b>76,587</b>

Table 32 – Housing Affordability

Data Source Comments:

### Housing Affordability - Additional Text

The HUD provided table below indicates the number of affordable units available to households at various income levels. Only 2,571 rental units are identified as affordable to households below 30% of the HUD Area Median Family Income (HAMFI) and represent only 7.3% of the total rental inventory in the HOME Consortium. The supply of units does not come close to accommodating households earning less than 30% of the HAMFI, most of whom are likely to be renters.

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	869	908	1,069	1,309	1,470
High HOME Rent	671	695	838	1,050	1,204
Low HOME Rent	671	695	838	1,000	1,116

**Table 33 – Monthly Rent**

Data Source Comments:

## Housing Rent and Value - Additional Text

Within the HOME Consortium, the Fair Market Rent (FMR) for a two-bedroom rental unit is \$1,069 (a 33.8% increase from the last Consolidated Plan). In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$3,563 monthly or \$42,756 on an annual basis. To earn that level of income, one would have to earn \$20.56 per hour assuming a 40-hour work week over 52 weeks for the year.

Within the HOME Consortium, the minimum wage is \$16/hour in 2024. Based on a 40-hour week, on annual basis, this translates to \$33,280, substantially short of what would be needed to afford a Fair Market Rent of \$1,069 per month. It would require two wage earners to make such units affordable.

## Housing Values

As of 2017, only 23.58% of the owner-occupied units within the Consortium were valued at less than \$100,000, while the bulk of the housing within the Consortium (64.17%) was valued between \$100,000 and \$299,999, and 12.36% was valued at \$300,000 or more. By 2022 only 10.33% of the owner-occupied units were valued at less than \$100,000. Interestingly, and troublingly, the housing values increased so aggressively in that time that the \$100,000-\$299,999 range also went down, albeit to 62.66%, while the \$300,000 and above range of housing value jumped to account for 27.01% of owner-occupied units within the Consortium. The median value for owner occupied units has increased a staggering 42.27% over that period.

Year	Median Sales Price
2017	\$150,000
2018	\$160,000
2019	\$166,900
2020	\$195,051
2021	\$222,035
2022	\$227,000
2023	\$258,000
2024	\$*253,750

**Table 43– Erie County Median Sales Price**

*\*Nine months*

*Source: BNAR*

**Table 43 Median Sales**

Housing Value	2017		2022	
	#	%	#	%
Less than \$50,000	7,596	4.90%	4,073	2.62%
\$50,000 to \$99,999	28,822	18.58%	11,969	7.71%
\$100,000 to \$299,999	99,564	64.17%	97,230	62.66%
\$300,000 to \$499,999	14,958	9.64%	30,440	19.62%
\$500,000 to \$749,999	2,922	1.88%	7,803	5.03%
\$750,000 to \$999,999	706	0.46%	2,000	1.29%
\$1,000,000 or more	586	0.38%	1,655	1.07%
Total <u>Owner Occupied</u> Housing Units with a Mortgage	155,154		155,170	
Median Value	\$148,300		\$211,000	

**Table 44 - Value of Owner-Occupied Units 2017 and 2022**

*Data Source: 2017, 2022 ACS Five Year Estimates*

**Table 44 Value of Owner Occupied**

	Number	Percent
Less than \$10,000	23,179	5.70%
\$10,000-14,999	18,706	4.60%
\$15,000-24,999	32,532	8.00%
\$25,000-34,999	32,938	8.10%
\$35,000-49,999	46,358	11.40%
\$50,000-74,999	67,503	16.60%
\$75,000-99,999	51,644	12.70%
\$100,000-149,999	68,317	16.80%
\$150,000-199,999	33,345	8.20%
\$200,000 or more	32,532	8.00%
	406,647	100.00%
Median Income	\$68,014	

**Table 45 – Income – Households in Erie County**

*Data Source: 2022 ACS Five Year Estimates*

**Table 45 Household by Income**

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

No. There is most definitely not sufficient housing at all income levels within the Erie County HOME Consortium. According to ACS data the median household income in Erie County has increased 32.7% from 2015-2022. While this represents a significant jump, that increase has been outpaced by the 42.3% increase in housing value for owner occupied units and the 37.5% increase in Fair Market Rent from 2015-2020 (data not available through 2022).

Attendees of the community and stakeholder meetings brought up housing prices and the lack of supply at all levels of affordability in the western New York market as the most significant challenge the region is facing. It is feared that continued cost increases, along with rising interest rates, will continue to price some people out of the market, while also disempowering renters in a high demand, low supply market. The Consortium is focused on using federal resources to support rehabilitation programs to allow low- and moderate-income individuals to make needed investments in their residences to maintain safety and quality of life, and to avoid being displaced into an extremely tight housing market.

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

There appears to be no let up in the increasing housing prices. Until or unless a large amount of new housing units are brought to market (at all levels of affordability), low and moderate income individuals will be at high risk of displacement and homelessness.

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

In the Consortium, median contract rents have increased 33.28% from 2017-2022 and Fair Market Rent is outpacing HOME Rents for everything from efficiencies up to four-bedroom units.

Stakeholders spent significant time speaking to the combination of increased building material costs, inconsistency in the supply chain and increases in lending rates over the last two years (not reflected in these numbers) as factors that are driving up the costs of construction and development of new units. At the same time, supply is relatively stagnant, demand is strong across all levels of the housing market, from affordable to market rate and even luxury. The result is that many private developers are only undertaking projects with higher margins, namely large single-family homes, putting additional strain on affordable housing in the Consortium and the region. Market forces put pressure on communities to leverage as much public funding as possible to try and 'make the math work' for affordable housing. The complicated capital stacks and difficulty leveraging enough funding for new affordable projects is a big reason the Consortium communities use a large share of CDBG funding for rehabilitation – to keep low- and moderate-income individuals in their existing dwellings and to maintain or improve the quality of housing.

## **Discussion**





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

### Introduction

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

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

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

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

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

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	0	0%	0	0%
With two selected Conditions	0	0%	0	0%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	0	0%	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

Table 34 - Condition of Units

Data Source: 2016-2020 ACS

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	20,240	17%	14,185	38%
With two selected Conditions	477	0%	522	1%
With three selected Conditions	140	0%	25	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	101,650	83%	22,465	60%
<b>Total</b>	<b>122,507</b>	<b>100%</b>	<b>37,197</b>	<b>99%</b>

**Table 46 - Condition of Units**

Data Source: 2016-2020 ACS

## Table 46 Condition of Units

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	0	0%	0	0%
1980-1999	0	0%	0	0%
1950-1979	0	0%	0	0%
Before 1950	0	0%	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

**Table 35 – Year Unit Built**

Data Source: 2016-2020 CHAS

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	14,882	12%	5,408	15%
1980-1999	25,777	21%	6,025	16%
1950-1979	53,044	43%	14,927	40%
Before 1950	28,817	24%	10,825	29%
<b>Total</b>	<b>122,520</b>	<b>100%</b>	<b>37,185</b>	<b>100%</b>

**Table 47 – Year Unit Built**

Data Source: 2016-2020 CHAS

## Table 47 Year Unit Built

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	0	0%	0	0%
Housing Units build before 1980 with children present	0	0%	0	0%

**Table 36 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	81,861	67%	25,752	69%
Housing Units build before 1980 with children present	6,474	5%	5,221	14%

**Table 48 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

**Table 48 Risk of Lead Based Paint**

	Owner Occupied	Renter Occupied	Total Occupied
Total Occupied Units	122,520	37,185	159,705
Built <u>Pre-1980</u>	81,861	25,752	107,613
Est. Low-Mod Occupied	24,558	11,588	36,146
Percent low-mod occupied *	30%	45%	
Est. Low-Mod risk of LBP hazard	3,684	2,897	6,581
Est. % risk of LBP hazard **	15%	25%	

**Table 49 - Estimate of Units at Risk with Lead-Based Paint Hazards**

\*Consortium - 34%, Assume renter- 45%, owner by default -30%

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

**Table 49 Estimate of Units at Risk of LBP**



**Map LEADS SAFE Erie County Communities 2024**

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Data Source: 2005-2009 CHAS

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

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

The table shows that 69 percent of the renter-occupied units and 67% of the owner-occupied units within the Erie HOME Consortium were built prior to 1980 and those built prior to 1978 are considered at risk for containing lead-based paint. Without a sample of all homes built prior to 1978, it is difficult to estimate the actual number of units having lead-based paint hazards.

In looking at the occupied units constructed prior to 1980 , the table below uses statistical data for the Consortium and assumes that approximately 45% of renters, 11,588, are low/moderate income and a homeowner percentage of 30%, or an estimated 25,752 households, are also low/moderate income.

On average, homeowners tend to have an interest and incentive to maintain their properties, which is likely to result in a smaller percentage of such households having the potential presence of lead-based paint hazards. It is assumed that 15% of low/moderate income homeowner units could have the presence of lead-based paint hazards and renters would have a higher percentage, estimated at 25%. Many of the low/moderate income homeowner households are seniors who have aged in place. Although many have maintained their properties over time, there is a percentage who may experience financial difficulty in being able to continue to maintain their properties and have been clients of the County and other assisted rehabilitation programs available to low-moderate income households.

Children were present in 6,474 owner units and in 5,221 renter units, which were built prior to 1980. These units probably have a greater likelihood of being reported if lead-based paint hazards are present whether occupied by low/moderate or non-low/moderate income households. Additional information regarding LBP is available in the Unique Appendices.

## Discussion

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

### **Introduction**

The Lackawanna Housing Authority (LHA) owns and manages three federally funded housing developments within the City of Lackawanna. These include Baker Homes (271 family units), Glover Gardens (125 family units), and Parkview Towers (94 senior units). No units are expected to be lost from the inventory over the next five years. Baker Homes and Glover Gardens consist of two-story buildings with about ten units per building. All of the two, three and four-bedroom units are configured in rowhouse fashion with each apartment having a first and second floor.

The Lackawanna Housing Authority does not intend to participate in any non-public housing residential development or preservation during 2024-2028. This type of housing activity is being handled by the Lackawanna Housing Development Corporation.

The **Tonawanda Housing Authority** (THA) is a state funded public housing authority and operates within the City of Tonawanda. Since it is a State funded agency, THA's 264 units are not included in the 491 units reported in the HUD-provided table above. As shown in the table below, there are three public housing developments in the City of Tonawanda, all of which are managed by the THA. Family developments consist of Colvin Kelly Heights (150 units) and Albright Court (64 units). Jacob Guzetta Apartments contain 50 senior units. The three developments are all located on the same site between Gibson and Hinds Streets.

The developments consist of 44 two-story buildings, which are mostly brick with a limited amount of vinyl siding on most of the buildings. The approximately 25-acre site easily accommodates the buildings with an overall low-density effect. The grounds as well as the buildings appear to be well maintained based on general exterior observation. As noted below, THA intends to replace the senior apartments with a new senior 3-story senior building and construct 4-6 accessible units on the site of the current senior facility. THA usually maintains full occupancy.

## 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			491						
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 38 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

Housing Development	Type	Year Built	Number of Units
Baker Homes	Family	1937	271
Glover Gardens	Family	1965	125
Parkview Towers	Senior	1985	94
<b>Total</b>			<b>490</b>

**Table 51 – Lackawanna PHA Inventory**

Source: Lackawanna Housing Authority

**Table 51 Lackawanna PHA Inventory**

Housing Development	Type	Year Built	Number of Units
Colvin Kelly Heights	Family	1943	150
Albright Court	Family	1959	64
Jacob Guzetta Apartments	Senior	1971	50
<b>Total</b>			<b>264</b>

**Table 52 – Tonawanda PHA Inventory**  
*Source: Tonawanda Housing Authority*

**Table 52 Tonawanda PHA Inventory**

**Describe the supply of public housing developments:**

**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:**

The Uniform Physical Conditions Standards (UPCS) Inspection Scores for the LHA properties as cited in the table below table are based on HUD inspections conducted in 2022-23. Individual project ratings were as follows:

- Parkview Towers – 99
- Baker Homes – 94
- Glover Gardens – 88

The maximum score is 100 and all properties are either high-performers or on the high end of the standard range. Since the Tonawanda Housing Authority is a state aided development, no inspection rating is available.



## Public Housing Condition

Public Housing Development	Average Inspection Score
Parkview Towers	99
Baker Homes	94
Glover Gardens	88

Table 39 - Public Housing Condition

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

In an effort to improve the safety of the Baker Homes, Glover Gardens, and Parkview Towers the LMHA continues to add cameras around the property to get more coverage and provide more safety for the residents. LMHA continues to address the physical needs of its properties. LMHA is updating windows throughout the property. The LMHA is also planning to continue with the ongoing replacement of roofs and gutters in the Glover Gardens. The LMHA also continues to paint, install new flooring, update kitchens and update bathrooms in apartments as needed.

In 2023, Tonawanda Housing Authority announced redevelopment plans for its properties. As part of Phase 1, JJ Guzzetta will be demolished and replaced with a new 3 story Senior building on the THA property, to be known as Hillview Commons. Construction is expected to start in 2025, subject to funding awards. It should be noted that Erie County has committed significant funding to help with the renovation and modernization of Hillview Commons. \$500,000 in Erie County HOME-ARP funding, and an additional \$500,000 in federal American Rescue Plan Act (ARPA) funding have been committed to the THA. Arthur Albright apartments (62 family units) will undergo a complete rehabilitation. THA will also add 4-6 ADA compliant units to its portfolio on the site of the old Seniors Buildings. Phase 2 will be a gut rehab of the Colin Kelly apartments (150 units). All of this is being financed via Tax Credit project financing with the help of NYSDHCR, with approvals pending. Tonawanda Housing is moving forward with redevelopment plans and has hired a Development Partner to drive the project forward along with NYSDHCR. Other improvements include replacing roofs in the Colin Kelly project and parking lot rehabilitation seal and striping and some landscaping.

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

THA has installed 2 Little Libraries / Food Pantries that are jointly managed between the Tonawanda School District students and THA. Tenant focused changes include electronic rent payment options, online application capability and “in house” application kiosk. THA also engages with the community to deliver local announcements for things like Neighbors United (pop up play dates) and the City of Tonawanda Recreation Department after school programs. In 2024 Tenant Representatives have held an

Easter Egg Hunt, NARCAN training, CPR / First Aid training on site with Tonawanda Fire Department and Erie County.

THA continued its Seniors Garden, where Seniors grow flowers and vegetables and spread them out to Tenants who need or want them. Tenant Reps continue to drive new ways to engage the THA property in thinking like a “community” through participation events like Easter Egg Hunt, Community Clean Up Day, Clothing and Bicycle give away day with support from local support organizations.

The Lackawanna Municipal Housing Authority (LMHA) has two Educational Resource Centers and a Wellness Center on site. When feasible again, the Educational Centers will be staffed, in conjunction with both Resident Councils, anywhere from 2-5 days a week. Various programs will again be offered including Cub Scouts, Girl Scouts, children's holiday parties and educational classes.

Within the Lackawanna Municipal Housing Authority (LMHA), the interests of tenants in management are met through three current tenant members who sit on the Authority Board, as well as through two active tenant councils within Parkview Towers and Baker Homes complexes. In conjunction with one of the LMHA’s Tenant Commissioners, the LMHA has offered courses and meetings to help tenants learn about home ownership at the Willie Cotton Community Center.

LMHA continues to try and work with different programs to provide service to our residents. For the kids during the summer, the LMHA partnered with the YMCA for the “Y On The Fly” program aimed to help youth of all ages to stay active and engaged in mind, body and spirit. The “Y On The Fly” program provided healthy meals, educational enrichment and physical activities, games and more. The LMHA has also partnered with the City of Lackawanna to provide lunches at both playground sites and worked with a local health insurer on a summer soccer program.

## **Discussion:**

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

### **Introduction**

The Erie County Department of Social Services continues to support programs that help the homeless including chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The programs include Emergency Assistance to Adults, Emergency Assistance to Families, and Emergency Safety Net Assistance. The programs provide financial assistance for shelter arrears, security agreements, water shutoff restore, heating equipment repair and replacement, home repairs, moving expenses and storage cost for furniture and personal belongings. These services help homeless people make the transition to permanent housing and independent living.

Working in conjunction with County agencies, The Homeless Alliance of Western New York (HAWNY) is the main regional agency addressing issues of homelessness. They act as an umbrella organization that coordinates funding, services and collaboration among area agencies and services for the homeless. HAWNY convenes regular meetings between the various agencies and advises municipalities within its jurisdiction, including Erie County, on homeless issues and related outreach efforts. Through HAWNY, the County also remains an active member of the Consortium of Care (CoC) and the Homeless Management Information System (HMIS). The Alliance has been publishing the Annual Report on the State of Homelessness in Erie County since 2010, a complete analysis of homeless data collected from HMIS to serve as a basis for planning and coordination of funding for homeless housing and services.

The County works closely with the CoC to use a best practice model for serving people experiencing homelessness on a regional basis. Since 2013, the County has used ESG dollars to fund Rapid Re-housing (RRH) and Homeless Prevention (HP) Programs to assist homeless and at-risk homeless families and individuals. The County prioritized people who have the longest homeless history and are most vulnerable. Including the County's RRH program and various RRH programs throughout the region funded by the CoC, City of Buffalo, Town of Tonawanda, and the VA that focuses on quickly rehousing people from shelters.

The County actively participates in the CoC's monthly meetings and other roundtable discussions, which cover topics like the Coordinated Entry system, prioritizing clients based on need assessments, ending youth homelessness, system outcomes, community priorities, Rapid Rehousing, and improving employment outcomes.

## Facilities Targeted to Homeless Persons

	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)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 40 - Facilities Targeted to Homeless Persons**

Data Source Comments:

**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**

The WNY Coalition for the Homeless is an association of over 50 service providers and community leaders who have joined together to empower and advocate for people in need of safe, affordable, and permanent housing and related services. These providers include social service agencies working in Erie County that provide benefits to very low and low-income individuals and families to address the needs of homeless people. These organizations provide many services to homeless or at-risk residents, including, but not limited to, life skills, alcohol and drug abuse treatment, mental health treatment, AIDS related treatment, education, employment assistance, childcare, transportation, counseling, parenting classes, and housing placement/assistance.

Several programs assist with transportation or bus tokens to individuals searching for housing, commuting to the workplace, or receiving services. These programs include the Erie County Department of Social Services Welfare Division, Medicaid Transportation, and the Independent Living Center.

Available resources for homeless individuals and families can be obtained by utilizing 211 WNY. Information includes basic needs, food assistance, holiday assistance, job training, legal counseling, mental health services substance abuse services, and limited transportation services.

Funding made available through United Way of Buffalo & Erie County's federal Emergency Food and Shelter Program (EFSP) provided households in Erie County with financial assistance for utilities and rent/mortgage payments to help prevent homelessness. The organizations that provided the services include:

- American Red Cross (ARC)
- Buffalo Urban League (through ARC)
- Buffalo City Mission
- Community Action Organization (through ARC)
- Community Services for the Dev. Disabled (through ARC)
- Compass House (through ARC)
- Evergreen Health Services (through ARC)
- Lt. Col. Matt Urban Human Services (through ARC)
- The Salvation Army.

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

- Buffalo Employment Training Service

- Buffalo Urban League Employment Program
- Buffalo Urban League Multi-Service Center
- Center for Employment Opportunity
- Educational Opportunity Center
- Employment and Service Center
- Greater Buffalo Works Program
- Restoration Society Empowerment Academy and ACE Employment Services
- Veterans Multi-Purpose
- Vocational and Educational Services for Individuals with Disabilities
- Vocational Training Center
- Workforce Investment Board

Legal Services for low-income individuals and families are provided through:

- The Public Defender's Office
- Neighborhood Legal Services
- Law Guardian
- Action for Mental Health
- Legal Advocacy for Disabled Individuals
- University at Buffalo Law Students
- Volunteer Lawyers Project
- Western New York Law Center

**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.**

Police departments and administrators of hospital emergency rooms across work together to identify the homeless, assess their needs, and refer them to appropriate agencies. Many police departments in Erie County have a Behavioral Health Team composed of specialty trained officers partnered with qualified mental health professionals. Law enforcement is also available to assist victims of domestic violence in emergency situations who are at risk of becoming homeless. In addition, the Family Justice Center assists in placement of homeless persons/families escaping domestic violence situations.

Erie County continues to address the needs of homeless people needing emergency or transitional shelter. The Erie County Department of Social Services provides that assistance to clients through organizations that operate emergency shelters and transitional housing through shelter allowances for the homeless clients. Shelter was provided to 1,999 singles and 332 families for a total of 3,884 persons

served from 10/1/2023-3/31/2024. During this same period 421 singles and 97 families were also provided with transitional housing assistance.

Erie County's ESG program focuses 60% of available funding for rapid re-housing activities, which assists homeless people living in shelters and places them in permanent housing quickly. This program provides short term rental assistance and case management to stabilize the household in housing.

The Code Blue program was created in 2009 by the Western New York Coalition for the Homeless to provide a warm place to sleep and eat when the temperature fell below 15 degrees. Since 2015, to respond to Governor Cuomo's Executive Order #151, Erie County's Department of Social Services provided funding for Code Blue when the temperature was 32-16 degrees. The City of Buffalo funds Code Blue when the temperature is below 15 degrees. During the Code Blue winter nights, the Western New York Coalition for the Homeless and Sylvia's House provides cots, food, and resources to homeless individuals. The Code Blue season runs from November 15th to April 30th each year. Two Code Blue shelters are provided serving over 900 unique individuals each year. As a result of this program, many hard to serve chronically homeless individuals were identified and engaged for services and supports.

Homeless shelters available to individuals in Erie County according to HAWNY's website include:

- Back to Basics (men only)
- Buffalo City Mission (adult males)
- Compass House (12-17 yr olds)
- Cornerstone Manor (single women / families)
- Family Promise of WNY (families)
- Haven House (victims of domestic violence)
- Hope House (women and children)
- Little Portion Friary (adults)
- Salvation Army (women and children/families)
- Temple of Christ: My Place Home (women and children/families)

Food and clothing assistance for the homeless can be found in Erie County at the following locations:

- Buffalo City Mission
- Central City Café
- Concerned Ecumenical
- Food For All
- Friends of the Night People
- Group Ministries

- Harbor House
- Hearts for the Homeless
- Matt Urban Hope Center
- Refuge Temple Pantry
- St. Luke's Mission of Mercy
- St. Vincent De Paul
- South Buffalo Food Pantry
- Urban Christian Ministries
- Valley Community Center



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

### **Introduction**

Special needs populations include, but are not limited to, persons who are mentally ill, mentally disabled, physically disabled, are substance abusers/addicts, have AIDS, are homeless, and are elderly and in need of supportive housing. Housing was the number one concern voiced throughout the stakeholder meetings that impacts all special needs populations; however, providing services to those with special needs was a close second and was oftentimes interconnected with housing issues.

There are a wide variety of programs and organizations that provide special needs facilities and services to the community. Ensuring access to information for providers and for those in need is critical and is addressed through several different platforms including Erie County NY Connects, which provides people of all ages, any disability, and caregivers with information about long term care, and 211 WNY, which provides free and confidential link to health and human services.

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

- Ready Set Home program provides funds to individuals on Medicaid under the Access to Home program for home modifications to help make the home more accessible for a person with a disability.
- Going Places is a service to older adults (aged 60+) in Erie County, in collaboration with community partners to provide curb-to-curb van services to seniors who are unable to use conventional means of transportation.
- Evergreen Health provides HIV care including care coordination, pharmacy, health insurance enrollment, HOPWA and other supportive housing opportunities, transportation assistance, food pantry, mental health counseling, substance use counseling and support groups. Haven House provides services based on a continuum of care ranging from an emergency shelter in a confidential location to long-term transitional housing for victims of domestic violence. New Life Residential Center provides a recovery house for women with substance abuse, mental health or domestic violence abuse. Rural Transit Service provides community transportation needs of senior citizens, disabled and low/moderate income residents in Erie County.

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

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

For elderly and frail elderly, the needs continue to grow as the population ages. These needs include access to affordable housing, including assistance in maintaining and modifying homes to make them accessible, allowing the elderly to age in place, and difficulty in accessing necessary goods and services due to a lack of transportation or difficulty in navigating multiple support networks.

For individuals with disabilities, including those with intellectual and developmental disabilities and ambulatory difficulties, access to affordable and accessible housing is a particular challenge. Contributing to this challenge are a lack of accessible housing stock and limited resources, as individual with disabilities tend to have lower incomes than individuals without disabilities (with 2018-2022 ACS data indicating that median earnings for individuals with disabilities residing in Erie County-Urban can be anywhere from \$14,446 to nearly \$21,000 lower than the median earnings for individuals without disabilities depending on whether the individual is male or female.) According to a representative from People, Inc. during the stakeholder meetings, as more individuals with intellectual and developmental disabilities (IDD) are living within the community the need for support services has increased. A lack of transportation can make accessing available services more difficult.

Stakeholders have noted a significant increase in the number and severity of domestic violence cases. This has created an increased need for support services, including emergency housing, transitional housing, and counseling and assisting victims of domestic violence in reestablishing their lives.

Growing refugee populations and increasing numbers of “New Americans” have put strain on existing support networks and a need to address language and cultural barriers.

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

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PLAN\_SECTION\_ID=[1350402000]>

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

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

- The County will continue to work with Housing Opportunities Made Equal (HOME) to provide fair housing counseling and mediation services, and Belmont Housing Resources for WNY for Housing counseling and workshops.

- Erie County will continue to implement the initiatives outlined in the “Live Well Erie” report, making funding available for affordable housing projects.
- The Erie County Department of Mental Health will continue to administer funding to provide access to supportive housing for individual experiencing serious mental illness and homelessness.
- Erie County will continue to implement its Language Assistance Plan to assist those persons with limited English proficiency.
- Housing rehabilitation funds will continue to be made available for special needs populations to assist them with housing repair and accessibility issues. Accessibility and mobility are disproportionate special needs in the Consortium because of the County’s large senior population.

**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))**

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

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

A joint Analysis of Impediments to Fair Housing Choice was completed in 2024 and submitted to HUD on February 14, 2020 for the Erie County CDBG Consortium; City of Buffalo; Amherst, Cheektowaga, Tonawanda Consortium; and the Town/Village of Hamburg. Barriers to affordable housing identified in the 2019 AI included, lack of supply, unaffordable housing costs, lack of funding, and the Not in My Back Yard (NIMBY) sentiment. An undated AI has been prepared in conjunction with the preparation of the Consolidated Plan. Since the prior AI in 2019, some progress has been made to expand access to affordable housing for residents in Erie County, including use of Federal funding to construct new affordable housing units across Erie County, enforcement of the County Fair Housing Law to provide recourse for residents facing discrimination, and actions by local governments, non-profits, and other organizations to provide additional support for those experiencing homelessness and other populations. In spite of this progress, continued impediments remain. The significant barriers identified in the 2024 AI include:

**Homelessness:** The number of people experiencing homelessness has nearly doubled since 2019, likely driven by the end of the COVID eviction moratorium and increasing housing costs. Suburban and rural communities resist the establishment of shelters and supportive housing to serve this population and restrict development through zoning and regulation. A lack of permanent affordable housing units and vouchers to serve the population in need, and a lack of supportive services such as counseling and education, makes it difficult to transition people out of homelessness.

**Lack of Affordable Housing:** The lack of affordable housing in Erie County is particularly acute in the suburban communities which have the greatest employment opportunities. NIMBYism, zoning restrictions, and other policies make it difficult to provide affordable housing near workplaces and changes in public transportation make it difficult for low income residents who find affordable housing in the City of Buffalo or the inner-ring suburbs to access jobs in the suburbs. Zoning and regulatory barriers limit the supply of multi-family housing, which leads to limited options and an increase in rents for the apartments that are available. Rural areas also lack housing and transportation options, limiting access to employment and services. Access to affordable housing is also limited by an inadequate supply of vouchers and the continued refusal of landlords to accept vouchers.

Public Impediments: Zoning and regulatory restrictions, including parking requirements, special use permits, and design guidelines, limit the development of multi-family housing in suburban communities and increase the costs for developments that can proceed, increasing rents and resulting in a lack of housing options. A lack of strict code enforcement has resulted in substandard housing. In addition, there has been an increase in fair housing complaints, particularly in the areas of familial status and source of payment, and enforcement is needed to ensure compliance by landlords. Public transportation, provided by the Niagara Frontier Transportation Authority (NFTA), to areas outside of the City of Buffalo and the inner-ring suburbs tends to be less frequent and accessible and since the preparation of the 2019 AI, the NFTA has cut routes serving lower-density outer-ring communities. The lack of transportation options creates burdens for suburban and rural populations who lack access to services and employment opportunities.

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

### Introduction

The following section describes the local workforce, the nature of current employment, and activities that coordinate economic development efforts across local and regional agencies. Historically, agencies such as the Erie County Industrial Development Agency, Lackawanna Community Development Corporation, West Seneca Development Corporation, Orchard Park Development Corporation, and Lancaster Village Partnership have functioned as subgrantees or subrecipients of CDBG funds for use in economic development programming. Data presented in this section reflects the entirety of Erie County as, unlike in 2019-2020, the information is not available specific to the Consortium. For economic metrics, the total County numbers are still reflective of the economic experience of those within the Consortium

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	2,130	1,081	0	0	0
Arts, Entertainment, Accommodations	39,954	48,286	9	10	1
Construction	22,730	18,013	5	4	-1
Education and Health Care Services	132,827	123,113	29	26	-3
Finance, Insurance, and Real Estate	39,339	32,546	8	7	-1
Information	7,621	6,449	2	1	-1
Manufacturing	47,654	44,672	10	9	-1
Other Services	20,641	19,838	4	4	0
Professional, Scientific, Management Services	48,047	67,418	10	14	4
Public Administration	20,945	20,910	4	4	0
Retail Trade	51,926	50,644	11	11	0
Transportation and Warehousing	22,463	22,647	5	5	0
Wholesale Trade	9,751	19,405	2	4	2
Total	466,028	475,022	--	--	--

Data Source Comments:

**Table 41 - Business Activity**

## Labor Force

Total Population in the Civilian Labor Force	0
Civilian Employed Population 16 years and over	0
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

**Table 42 - Labor Force**

Data Source Comments:

<b>Labor Force</b>	
Total Population in the Civilian Labor Force	490,302
Civilian Employed Population 16 years and over	466,028
Unemployment Rate	5.0%
Unemployment Rate for Ages 16 to 19	12.0%
Unemployment Rate for Ages 20 to 24	7.4%
Unemployment Rate for Ages 25 to 29	6.2%
Unemployment Rate for Ages 30 to 34	4.6%
Unemployment Rate for Ages 35 to 44	4.1%
Unemployment Rate for Ages 45 to 54	3.9%
Unemployment Rate for Ages 55 to 59	4.1%
Unemployment Rate for Ages 60 to 64	3.6%
Unemployment Rate for Ages 65 to 74	3.9%
Unemployment Rate for Ages 75 and over	3.0%

**Table 55 – Labor Force – Unemployment by Age**

*Source: 2022 ACS 5 Year Estimates*

**Table 55 Labor Force Unemployment by Age**

<b>Occupations by Sector</b>	<b>Number of People</b>
Management, business and financial	0
Farming, fisheries and forestry occupations	0
Service	0
Sales and office	0
Construction, extraction, maintenance and repair	0
Production, transportation and material moving	0

**Table 43 – Occupations by Sector**

Data Source Comments:



<b>Occupations by Sector</b>	<b>Number of People</b>
Management, business, science, and arts occupations	199,448
Service occupations	80,100
Sales and office occupations	104,691
Natural resources, construction, and maintenance occupations	28,735
Production, transportation, and material moving occupations	53,054

**Table 56 – Occupations by Sector**

*Source: 2022 ACS 5 Year Estimates*

#### Table 56 Occupations by Sector

#### Travel Time

<b>Travel Time</b>	<b>Number</b>	<b>Percentage</b>
< 30 Minutes	312,473	76%
30-59 Minutes	81,604	20%
60 or More Minutes	15,993	4%
<b>Total</b>	<b>410,070</b>	<b>100%</b>

**Table 44 - Travel Time**

Data Source Comments:

#### Education:

#### Educational Attainment by Employment Status (Population 16 and Older)

<b>Educational Attainment</b>	<b>In Labor Force</b>		<b>Not in Labor Force</b>
	<b>Civilian Employed</b>	<b>Unemployed</b>	
Less than high school graduate	0	0	0
High school graduate (includes equivalency)	0	0	0
Some college or Associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

**Table 45 - Educational Attainment by Employment Status**

Data Source Comments:

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	18,614	1,480	11,973
High school graduate (includes equivalency)	78,129	4,184	33,991
Some college or <u>Associate's</u> degree	106,260	3,211	27,600
Bachelor's degree or higher	180,039	2,565	19,002
<b>Table 58 - Educational Attainment by Employment Status</b>			
<i>Data Source: 2022 ACS 5 Year Estimates</i>			

**Table 58 Educational Attainment**

#### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

**Table 46 - Educational Attainment by Age**

Data Source Comments:

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	760	2,922	3,516	6,850	6,769
9th to 12th grade, no diploma	6,167	5,641	4,351	11,783	10,599
High school graduate, GED, or alternative	24,903	27,058	21,362	65,270	61,377
Some college, no degree	35,310	24,509	18,974	45,441	30,751
Associate's degree	5,032	13,424	12,960	35,435	18,106
Bachelor's degree	14,043	37,621	26,417	47,836	23,687
Graduate or professional degree	2,314	22,163	25,289	36,849	24,408
<i>Data Source: 2022 ACS 5 Year Estimates</i>					

**Table 59 – Educational Attainment by Age**

*Source: 2022 ACS 5 Year Estimates*

**Table 59 Educational Attainment by Age**

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

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
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 47 – Median Earnings in the Past 12 Months**

Data Source Comments:

<b>Median Earnings in the Past 12 Months</b>	
<b>Educational Attainment</b>	<b>2022 Inflation Adjusted Dollars</b>
Less than high school graduate	40,638
High school graduate (includes equivalency)	35,207
Some college or <u>Associate's</u> degree	45,745
Bachelor's degree	61,821
Graduate or professional degree	71,621
Data Source: 2022 ACS 5 Year Estimates	

**Table 60– Median Earnings Last 12 Months**

*Source: 2022 ACS 5 Year Estimates*

### Table 60 Median Earnings

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

Within Erie County, the Education and Health Care Services sector employs 29% of all workers. The next largest employer sectors include Retail Trade (11%), Professional, Scientific, and Management Services (10%) and Manufacturing (10%). These four industry sectors employ 60% of all workers within the County. Comparatively at the time of the 2020-2024 Consolidated Plan, these industry sectors comprised 54% of all workers within the Consortium.

Notably there are more workers than jobs in education and health care services (3%) and in finance, insurance, and real estate (2%). Within these industry sectors this suggests that workers travel outside of Erie County for employment. Alternatively, there are more workers than jobs in Professional, Scientific, and Management Services (4%), Wholesale Trade (2%), and Arts Entertainment, and Accommodations (2%).

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

According to representatives from the Erie County Industrial Development Agency and the Erie County Workforce Investment Board, a primary challenge in Erie County is the mismatch between available jobs and the skills of the local workforce. While there is demand for skilled workers in industries like healthcare, technology, manufacturing, and construction, many local residents lack the education or training to fill these positions. This skills gap highlights the need for expanded workforce development programs, including partnerships between local businesses, educational institutions, and vocational training centers. Efforts to promote technical education, apprenticeships, and upskilling initiatives are crucial to ensuring a workforce equipped for the demands of modern industries. Additionally, attracting and retaining talent, particularly younger professionals, is vital to the region's long-term economic vitality.

Erie County also faces significant infrastructure challenges that affect its business community. The region's transportation network, including roads, bridges, and public transit, is aging and in need of upgrades to ensure smooth connectivity for businesses. Reliable infrastructure is essential for the movement of goods, access to markets, and employee commuting. There is also a need to invest in modernizing broadband internet access, particularly in rural areas, to support remote work and digital businesses which is why in 2022, ErieNet Local Development Corporation (ErieNet), a not-for-profit local development corporation, was formed to develop and operate the OAN, which is to be comprised of 400 miles of fiber optic backbone comprised of headend and regional points of presence, interconnections to public and private broadband providers, aerial and buried cable pathways, fiber optic cabling and components, and community anchor institutions (CAI's) endpoints. The dark fiber provided by ErieNet can be used by CAI's for their own network communications and applications and also by telecommunications carriers, Internet Service Providers and other public and private broadband providers to extend and connect their infrastructure to their constituents and customers.

Energy infrastructure improvements are equally important to meet the growing demand for sustainable, affordable energy solutions that can support the county's varied industries.

**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.**

One of the most notable projects with economic implications is the Buffalo Niagara Medical Campus expansion, which is expected to generate thousands of jobs in healthcare, research, and biotechnology fields. This development, which has already attracted significant private investment, is transforming the downtown area into a major hub for medical research and innovation. As the campus grows, it will increase demand for skilled workers in healthcare and life sciences, creating opportunities in areas like nursing, medical research, and healthcare administration.

Another key initiative is the Buffalo Green Code, a long-term urban development plan focused on revitalizing neighborhoods and encouraging sustainable growth. This initiative includes investments in

infrastructure, housing, and commercial real estate to support local businesses and attract new companies. The Green Code will likely result in job creation in construction, urban planning, and the green energy sectors, as well as in industries that benefit from improved transportation networks and mixed-use development.

Additionally, the redevelopment of the Outer Harbor and Buffalo waterfront is attracting both public and private investment. Plans for this area include a mix of recreational spaces, residential units, and commercial developments, with a focus on attracting tourists and residents alike. This revitalization is expected to create opportunities in hospitality, retail, and tourism, boosting the local economy.

As these changes unfold, they will create new workforce development needs. For instance, the growth of the healthcare and biotechnology sectors will require specialized training and education programs. Erie County will need to invest in partnerships between local colleges, universities, and industry leaders to offer programs in medical technology, biotechnology, and healthcare administration. Similarly, the Green Code's focus on sustainability and green building will require workers skilled in energy-efficient construction, urban planning, and environmental science.

Stakeholders noted that in terms of infrastructure, Erie County's transportation network must be modernized to support these developments. Investment in public transit systems and roadways will be critical to ensuring that workers can easily access new job opportunities, especially as development shifts toward the waterfront and medical campus. The need for expanded broadband access, particularly in rural areas, is also essential to support businesses and remote workers, helping to connect the county with global markets and attract digital industries.

Lastly, Erie County must focus on improving its business support infrastructure. This includes increasing access to financial resources for small businesses, offering incentives for new startups, and creating spaces for innovation and entrepreneurship. Encouraging collaboration between the public and private sectors will be key to ensuring that these transformative changes lead to sustainable job growth and economic development in Erie County over the next five years.

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

There exists a disconnect between the skills possessed by job seekers and those required for many of the available employment opportunities. Stakeholders pointed specifically to trends toward advanced manufacturing creating a skills gap for both older employees and job seekers and new entrants to the labor pool. New and ongoing public and private investments in advanced manufacturing, energy-related fields, and the technology sector are anticipated to only widen that gap.

**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.**

Workforce Buffalo is a network of employment training providers, educational institutions, economic development agencies, and community services organizations that work together to provide career and workforce assistance. This network includes the Buffalo and Erie County Workforce Investment Board (WIB). The ACT Consortium participates in the workforce development and training initiatives sponsored by the WIB.

Workforce Buffalo includes Career Centers that provide basic career services for all job seekers, with a priority of career and training services given to low-income individuals, those who are basic skills deficient (including English language learners) and to veterans and eligible spouses. The main career center is located at the SUNY-Erie Community College (ECC) North Campus located in the Town of Amherst. The one-stop career center provides assistance with job searches, resume preparation, interviews, job training needs, promotion and career transition. A satellite career center is located at ECC's South Campus in Orchard Park. Workforce Buffalo's other Career Center is the Buffalo Employment Training Center which provides services for workers, job seekers, and businesses, including specialized programming for veterans, young adults (16+), and recently incarcerated individuals.

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

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

The Northland Workforce Training Center, located in Buffalo, provides training to help workers capitalize on new economic opportunities in the advanced manufacturing and technical fields. Other agencies providing employment and workforce development programs to Erie County residents include: ACCES-VR (individuals with disabilities), the Adult Education Division of the Buffalo Public Schools, and Center of Employment Opportunities (recently incarcerated individuals).

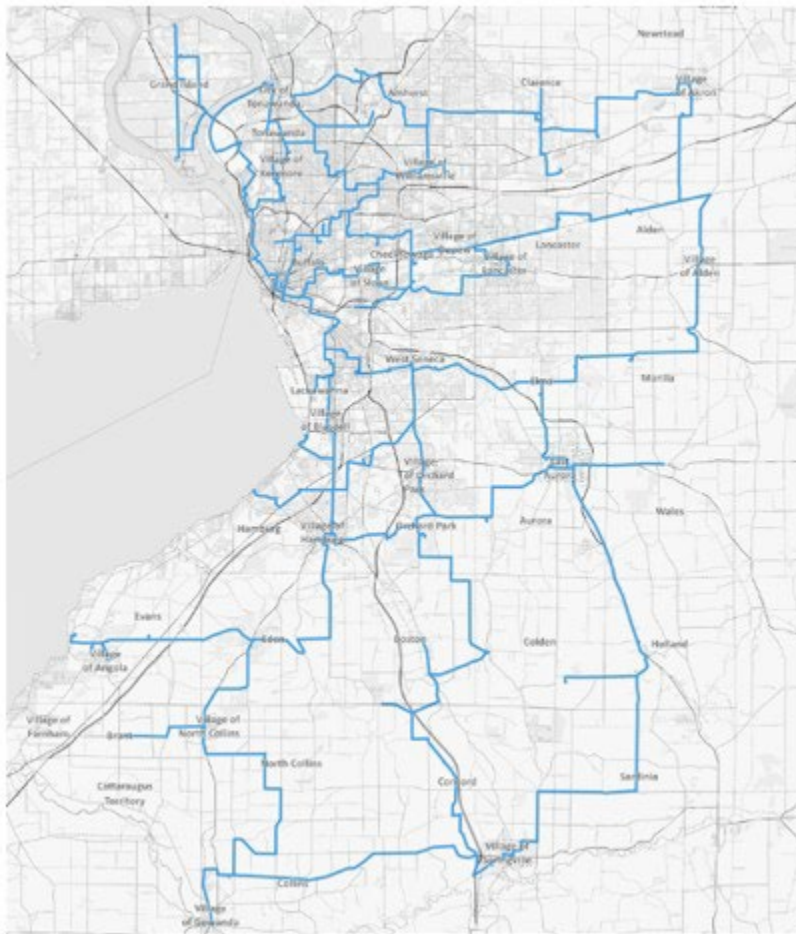
**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes

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

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PLAN\_SECTION\_ID=[1370705000]>

## Discussion



Map ErieNet Broadband Coverage in Erie County

## **MA-50 Needs and Market Analysis Discussion**

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

To look at housing problems, HUD CPD data was used to display the percentage of extremely low-income households experiencing one or more severe housing problem including:

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

Concentration is defined as having a value within the top two quintiles of the distribution, which in this case is a value over 76.32%. The map below shows the proportion of extremely low-income households facing severe housing problems (lack of kitchen, lack of plumbing, severe overcrowding, or severe cost burden). A total of 23 census tracts have concentrations of severe housing problems within extremely low-income households. In general, these areas include parts of Eden, Orchard Park, West Seneca, Lackawanna, Lancaster, Akron, Clarence, and Grand Island.

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

The Analysis of Impediments to Fair Housing Choice (2024) identified six census tracts within the “Erie County-Urban County” with significant concentrations of both poverty and minority populations. More specifically, these Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), are defined as areas where the non-white fraction of the population is more than double the overall non-white fraction of the population in the community and where the local poverty rate (census tract) is more than twice as large as the community poverty rate.

The six census tracts listed below have been identified as concentrated areas of racial and ethnic minorities and low-income populations. As shown in the map below, these areas are located in the City of Lackawanna; in the Town of Collins, where there is a correctional facility; in the Seneca Nation Territory (Cattaraugus Reservation), where there is a concentration of Native Americans; and one in the Town of Evans. The racial and ethnic groups most impacted by concentrated poverty in the Urban County are Black or African American residents in Lackawanna and Collins, Asian American residents in Evans and Cattaraugus, and Hispanic or Latinx residents in all R/ECAP areas except for Evans.

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

The housing market in the City of Lackawanna is facing significant challenges, primarily due to the age and deterioration of its housing stock. Approximately 80% of the housing units in Lackawanna’s First



Ward were built before 1960, and many of these properties are in need of substantial rehabilitation. In addition to aging homes, commercial areas in the city often feature numerous vacant storefronts, some of which have been repurposed into residential units. These commercial districts are in need of both physical and economic revitalization to spur growth and attract investment.

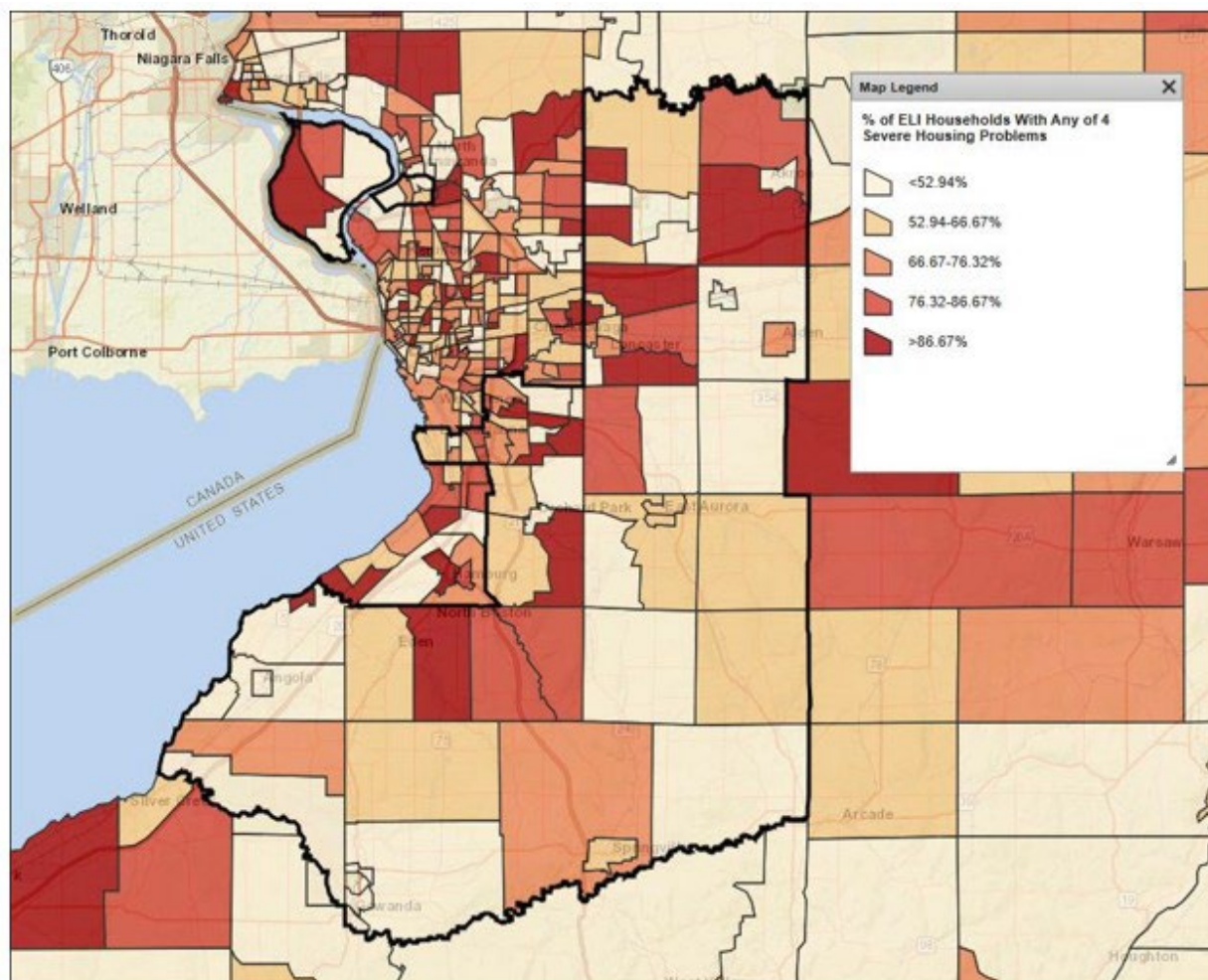
Lackawanna's First and Second Ward neighborhoods are the most economically distressed in the city, characterized by high poverty rates, widespread blight, and elevated vacancy rates. The combination of deteriorating housing, economic disinvestment, and social challenges highlights the urgent need for targeted revitalization efforts. Addressing these issues will be crucial in improving the quality of life for residents and fostering long-term economic stability in these neighborhoods.

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

Assets in the City of Lackawanna include all three of Lackawanna Housing Authority's (LHA's) federally funded housing developments, the ongoing efforts of the Lackawanna Housing Development Corporation to develop new quality units on-line, and the former Bethlehem Steel Site where there is an ample supply of developable land.

**Are there other strategic opportunities in any of these areas?**

The City of Lackawanna features two federally designated Opportunity Zones designed to incentivize private sector investment. The former Bethlehem Steel side is an ideal location for incentivized commercial activity that will support the surrounding residents.



CPD Maps: % of ELI Households with any of 4 Severe Housing Problems

Map % of ELI Households with any of 4 Severe Housing Problems

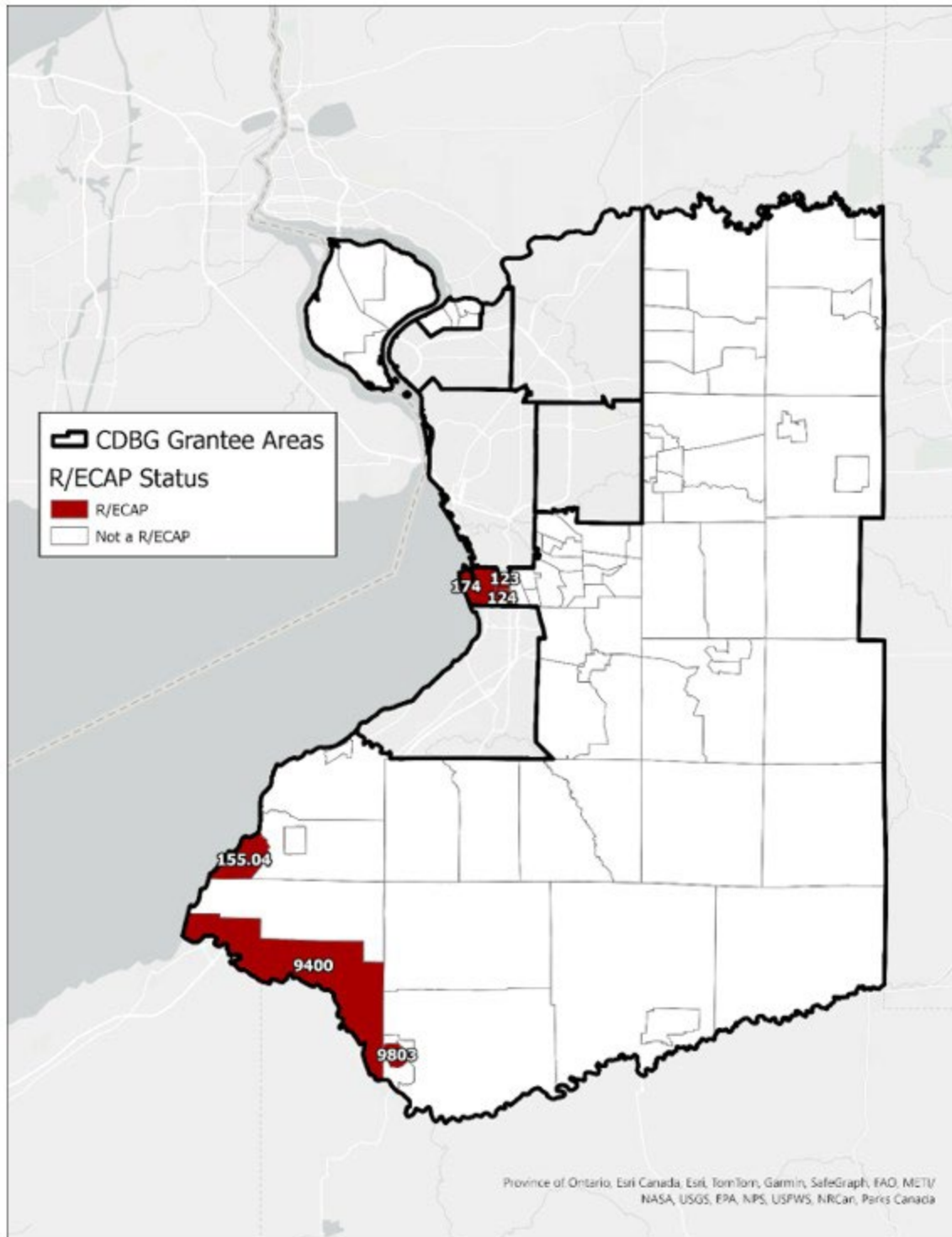
Tract	Population	% Black	% Asian	% Hispanic or Latinx	% All Persons of Color, Combined	Poverty Rate	>50% of Households are LMI?*
123	3,838	9.7%	0.0%	6.5%	20.2%	35.1%	Yes
124	2,428	20.4%	2.8%	5.8%	36.8%	22.3%	Yes
155.04	3,282	2.2%	2.1%	0.0%	5.6%	16.1%	No
174	4,190	45.5%	0.0%	7.6%	59.3%	27.4%	Yes
9400	1,875	1.9%	5.0%	5.4%	86.5%	30.7%	Yes
9803	702	48.6%	0.0%	11.0%	75.6%	17.1%	No

**Bold red text** indicates that the relevant R/ECA thresholds for these population subgroups are exceeded in a given R/ECAP (see Table 3.7) \*LMI = Low-to-moderate income

Table 61 - Inventory of R/ECAPs in Erie County – Urban County-

Source U.S. Census ACS 2018-22

Table 61 Inventory of R. ECAPs in Erie County



**Map R.ECAPs Status**

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

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

There is a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, but these providers either do not target residential or small business, or price their fiber optic services such that they are prohibitively expensive to residential users or small business.

The Erie County Broadband Committee has specifically identified “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” as a significant need.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

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

Verizon and Spectrum service levels vary, depending upon the infrastructure and services available in different parts of the County. The study found that while the urban and suburban areas of the County are for the most part served in terms of access and competition, many of the rural areas of the County, which are towns and villages to the south and east, are lacking and expected to fall further behind.

The 2017 Study identified a lack of essential infrastructure in the form of competitive choices of fiber optic service provider(s) to city, town, and village neighborhoods within the Consortium, other than Verizon FiOS™. While there was a fair amount of fiber optic cabling supporting the larger businesses of

metropolitan Buffalo, the providers either did not target residential or small business, or priced their fiber optic services such that they were prohibitively expensive to residential users or small business.

To meet the goal of “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” one path was the creation of an Open Access Network (OAN) that would be available to public and private organizations and would improve broadband service throughout the Consortium. The creation of the OAN views broadband infrastructure as a utility necessary to maintain quality of life and keep communities competitive. While the development of the OAN was the most aggressive proposal in the 2017 Study, the availability of funding under the American Rescue Plan Act (ARPA) made the OAN a viable option for providing broadband service. In 2021, Erie County commissioned ECC Technologies, Inc. (ECC) to develop an OAN Business Plan, including a preliminary route design for a middle-mile fiber optic backbone interconnecting cities, towns and villages throughout the County. In 2022, ErieNet Local Development Corporation (ErieNet), a not-for-profit local development corporation, was formed to develop and operate the OAN, which is to be comprised of 400 miles of fiber optic backbone comprised of headend and regional points of presence, interconnections to public and private broadband providers, aerial and buried cable pathways, fiber optic cabling and components, and community anchor institutions (CAI’s) endpoints. Examples of CAI’s include County facilities, 911 centers, libraries, municipal facilities, school district facilities, higher education institutions, healthcare facilities, and other major employers. The dark fiber provided by ErieNet can be used by CAI’s for their own network communications and applications and also by telecommunications carriers, Internet Service Providers and other public and private broadband providers to extend and connect their infrastructure to their constituents and customers. Construction and launch of the OAN is being funded with \$34 million in ARPA funds and an additional \$2.8 million in County funding for design and construction management services. Installation has begun and is expected to be completed in mid-2025.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

In March 2023, along with the University of Buffalo, the County published the Erie County Climate Vulnerability Assessment in funded in part by the Climate Smart Community Grant Program, Title 15 of the Environmental Protection Fund through the NYS Department of Environmental Conservation.

The plan analyzed the County's exposure and vulnerability to changing climate conditions, including but limited to:

- Increased temperatures and more heat waves
- Enhanced intensity of both floods and drought
- Longer growing seasons, but changes in what is able to be effectively grown
- More variability in lake levels and increased shoreline erosion
- Warmer lake temperatures that exacerbate algal blooms, leading to polluted water
- Amplified threats to human health (e.g., reduced air quality, risk of disease-carrying insects, and extreme temperatures)

Ultimately the plan assessed the potential effects of hazards and the County's specific sensitivity to extreme heat, flooding, high winds, biological hazards, and limitations related to mobility and accessibility in order to gauge the County's preparedness for natural hazards and to develop an action plan for hazard mitigation, hazard preparation, hazard response, and hazard recovery.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Erie County is committed to anticipating and mitigating to whatever extent possible, the vulnerability of housing occupied by low- and moderate-income households to increased natural hazards associated with climate change. In 2020 Erie County established the Climate Action Fund, that reinvests half of the cost savings achieved through energy conservation and waste reduction into sustainability initiatives.

The County has committed to utilize the Climate Action Fund to invest in "Opportunities" identified in the Climate Action and Sustainability Plan to directly respond to identified "Threats" and "Vulnerabilities" as further articulated in the Unique Appendices.

Additionally, the County has partnered with the New York State Energy Research and Development Authority to develop the Erie County Low-Income Program for Sustainable Energy (ECLIPSE). ECLIPSE is intended to create a community-scale program to provide integrated energy services for Low- to Moderate-Income (LMI) households by purchasing energy in bulk for as many as 60,000 Home Energy

Assistance Program (HEAP) recipients in Erie County. An interdepartmental county team will work with partners, such as utilities and community organizations, to develop strategies to recruit LMI households into this bulk purchasing program.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Erie County Department of Environment and Planning (DEP) is the lead agency for the Erie County CDBG Consortium and the Erie County HOME Consortium. It coordinates, supports, and implements planning programs and development projects that improve the quality of life for Erie County residents, businesses, and visitors.

The geographic area of the Erie County CDBG Consortium is Erie County minus the City of Buffalo; the Towns of Amherst, Cheektowaga, Tonawanda, and Hamburg; and the Villages of Kenmore, Williamsville, Hamburg, Blasdell and Sloan. The CDBG Consortium's large population centers include the Cities of Tonawanda and Lackawanna and the Towns of West Seneca, Lancaster and Clarence.

The Erie County HOME Consortium consists of the same municipalities that are part of the Erie County CDBG Consortium plus the Town of Hamburg and the Villages of Blasdell and Hamburg.

The Consortium communities have seen significant increases in housing costs for both renters and owners and a resultant increase in housing cost burden, particularly for the rapidly growing elderly populations. Costs, combined with the lifting of the eviction moratorium have created real concerns about housing insecurity and have prompted the Consortium to increase the focus on housing programs to leverage the creation of new affordable units and to rehabilitate existing units to enable individuals, particularly low- and moderate-income individuals, to remain in their residences.

Infrastructure improvements are identified as a priority need in the Consortium. The Consortium plans to improve sewer and water service to targeted low-income neighborhoods in The Consortium. In addition, the Consortium will invest in improving storm drainage and flood protection facilities in targeted low-income neighborhoods. The Consortium plans to improve access to public sidewalk facilities and the Consortium will focus on improving vehicular and bicycle access to areas of employment and commercial activity located in targeted low-income neighborhoods.

The Consortium plans to improve access to community centers and youth centers that serve low- and moderate-income areas by investing in upgrades in accordance with the Americans with Disabilities Act. In addition, the Consortium will invest in Senior Center improvements to accommodate the growing elderly population in Erie County and will invest to develop and expand and rehabilitate parks, recreation, and open space facilities that serve low- and moderate-income residents.

The Consortium will also invest in both commercial centers and small businesses through its Smart Growth façade improvement program and microenterprise lending to create employment opportunities for low- and moderate-income individuals.



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

### Geographic Area

Table 48 - Geographic Priority Areas

1	<b>Area Name:</b>	City of Lackawanna - First Ward Target Area
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Other
	<b>Other Revital Description:</b>	RECONSTRUCT CITY STREETS FOR PUBLIC SAFETY & WELFARE.
	<b>Identify the neighborhood boundaries for this target area.</b>	The target area is the First Ward of Lackawanna. The neighborhood is a generally triangular area bounded by the City of Buffalo on the north, NY Route 5 on the west, the Village of Blasdell on the south and railroad yards on the east.

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>One of the oldest parts of the City of Lackawanna, many of the homes and structures in Lackawanna's First Ward date to the early 1900's when they were built as housing for workers at the adjacent Lackawanna Steel Mill. Additionally, housing stock in these older neighborhoods tends to have higher concentrations of lead-based paint that needs to be addressed with any county-funded rehabilitation work or through the Erie County Department of Health case referral program.</p> <p>The housing stock of the First Ward is older than that of the rest of Lackawanna and all of Erie County. Eighty percent of the housing units in the First Ward were built before 1960. The rate at which new units have been added to the First Ward is notably less than for comparable places in Lackawanna and Erie County. However, recent efforts by Erie County have focused on the creation of infill, single-family housing in this area. To date, Erie County, through its HOME funds, has constructed eight (8) new single-family homes within the First Ward. Four of these homes were sold to first-time homebuyers, and the other four were rental units. Also, four more in-fill lots are underway and will come on-line in the very near future. All four of these are modular homes through a partnership with Habitat for Humanity. It should be noted that the largest number of minorities in the Consortium is in the City of Lackawanna.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The DEP requires a written request from the chief elected official within the municipality that is seeking a designation of Local Housing/Reinvestment Target Areas. The request seeks an analysis of a specific neighborhood for local target designation. The DEP reviews the request to determine whether the area represented is of an appropriate size and appears to be a candidate area. The DEP requests the municipality to have a completed Local Target Neighborhood Revitalization Study for the area. The study should include a citizen's participation and local area consultation process.</p>

	<p><b>Identify the needs in this target area.</b></p>	<p>The Lackawanna Municipal Housing Authority operates three federally funded housing developments in the City of Lackawanna. The developments have a total of 490 units: 396 for families and 94 for senior citizens. Seniors occupy approximately 25-30 of the family units.</p> <p>The housing stock of the First Ward is older than that of the rest of Lackawanna and all of Erie County. Eighty percent of the housing units in the First Ward were built before 1960. The rate at which new units have been added to the First Ward is substantially less than for comparable places in Lackawanna and Erie County.</p> <p>Further, as mentioned above, lead-based paint is a substantial problem within the target area due to the age of the housing stock. All rehab work funded through CDBG/HOME funds will ensure the property is made lead-safe if disturbing any painted surfaces. Also, through the county's housing rehab program, any homes within an identified high-radon designated area, as per NYS Department of Health, will be tested for radon and remediated if over prescribed limits.</p>
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<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>The comprehensive revitalization of the First Ward neighborhood will require a number of different programmatic strategies to address the numerous identified problems. These strategies should include both the need for increasing local community capacity to work on community revitalization issues, development of a strategic plan for implementation of revitalization projects, and the development of financial resources to implement those projects.</p> <p>As a result of housing rehabilitation programs, recommended upgraded energy efficient systems may be installed and help offset the rising cost of utilities. These systems will include weatherization, insulation and heating upgrades with energy efficient furnaces or boilers. Also, new windows and doors may be installed in 75%-80% of the homes. Nearly all of the homes will undergo a risk assessment for the presence of lead-based paint hazards. Any and all of these hazards will be either remediated or abated through this program, with a clearance inspection to follow all rehab work.</p> <p>Many safety improvements will also be included. All unsafe stairways will be brought up to New York State building code specifications in regard to riser height, tread depth, guard rails and handrails. Any antiquated electrical services will be upgraded to circuit breaker panel boxes, and all the homes rehabbed will include exterior lighting upgrades in order to provide a safer living space and neighborhood.</p>
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	<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The primary barrier to improvement is the lack of financial resources for both physical improvements and human service programs targeted toward the needs of public housing residents.</p> <p>Efforts continue to revitalize the former Bethlehem Steel site on the western edge of the First Ward. Erie County, New York State, and City officials have redeveloped significant portions of the former steel site to make way for new manufacturing and distribution facilities, including the Renaissance Commerce Park. These investments have created new employment opportunities for area residents and should continue to spur further development in the once blighted area.</p>
2	<b>Area Name:</b>	Village of Depew- Main Street/Terrace Blvd. Target Area
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>This plan focuses on identifying key improvements for the Main Street area which encompasses Block Group 1 and 2 of Census Tract 145.02. This area consists of two sub-areas: the former Dresser industrial site and the Main Street and Terrace Boulevard neighborhood.</p> <p>The neighborhood is set apart from the rest of the village due to physical barriers. Rail lines border the neighborhood on the north and south, and the former Dresser Steel industry site borders it on the west. These barriers limit access to the neighborhood.</p>

<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>An unusually high number of housing units are occupied by renters. More importantly, much of the property in the Main Street neighborhood is owned by absentee landlords while the Terrace Boulevard neighborhood is mostly owner –occupied by low income people. The investments normally made by homeowners are not seen in the rental units. Over time, many of the absentee landlords' units have deteriorated and are now in need of significant repair, or in some cases, demolition, while the owner-occupied units need rehabilitation assistance.</p> <p>To address significant housing disinvestment, Village officials have begun to explore creation of new affordable housing units with local housing developers. Site tours have occurred to potentially locate suitable sites within the village to create new affordable rental units.</p> <p>On Main Street, a significant number of former commercial storefronts are vacant. Many of these structures have been converted into residential units. What was once a vibrant commercial strip is now a symbol of decline. Community efforts are underway to help revitalize commercial vacancies, including a new community center in the former Dom Polski building that hopes to spur further investment.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The Village of Depew continues to hold annual public meetings with local business owners and stakeholders. The purpose of the meetings was to familiarize the public with the type of projects that could benefit the neighborhoods through the CDBG and HOME programs.</p> <p>Group discussions took place to obtain feedback and direction from residents regarding their opinions of the neighborhoods.</p>

<p><b>Identify the needs in this target area.</b></p>	<p>The Main Street Neighborhood is primarily a residential community with vacant property and a small number of businesses, while the Terrace Boulevard neighborhood is primarily residential with a public park and school.</p> <p>Over the past twenty-five years, areas of the village have undergone change. This has been particularly true in the Main Street neighborhood. What was once a vibrant residential, commercial, and industrial area is now dotted with vacant residential and commercial property. These changes were brought about by the closing of the former Dresser Steel Plant, a 44-acre industrial parcel located adjacent to the neighborhood.</p> <p>According to the village's application for Erie County funding, 1,080 out of the 2,180 residents of the Main Street and Terrace Boulevard neighborhoods fall into low to moderate income categories.</p> <p>The majority of the dilapidated housing units are occupied by renters. More importantly, much of the property in the neighborhood is owned by absentee landlords. The investments normally made by homeowners in the Main Street area are not seen in these rental units. Over time, many of the absentee landlords' units have deteriorated and are now in need of significant repair, or in some cases, demolition. The Village is seeking increased funding opportunities for the Rental Rehabilitation program through Erie County's CDBG program.</p> <p>As described above under the City of Lackawanna target area section, aging housing stock within the Village of Depew also correlates to higher percentages of homes with lead-based paint hazards. Any county-funded rehabilitation work through CDBG/HOME funds will ensure that the housing unit is made lead safe if disturbing painted surfaces. Additionally, homes in identified high-radon areas, as per NYS Department of Health, will also be tested for radon. If levels are above prescribed guidelines, radon mitigations systems will be installed as part of the rehab process.</p> <p>The Village of Depew, largely through utilizing Erie County CDBG grant funds, has made a significant investment in area infrastructure. Over the past five years, over \$600,000 has been expended on sidewalk replacement within the older, residential areas.</p>
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	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvement include: <ul style="list-style-type: none"> <li>• Improving code enforcement</li> <li>• Rehabilitating and / or demolish vacant property</li> <li>• Improving infrastructure</li> <li>• Rebuilding and modernizing commercial centers</li> <li>• Improving water and utility services</li> <li>• Improving fire safety</li> <li>• Improving vehicle and pedestrian access for residents of adjoining neighborhoods</li> </ul>
	<b>Are there barriers to improvement in this target area?</b>	The Dresser industrial site is viewed as a blighted area and an obstacle to neighborhood revitalization. The site limits access to Transit Road and is a 'dead end' to east-west streets coming from Central Avenue in Lancaster. It is also a source of unwanted trucks and heavy traffic in an increasingly residential neighborhood.

### General Allocation Priorities

Describe the basis for allocating investments geographically within the state

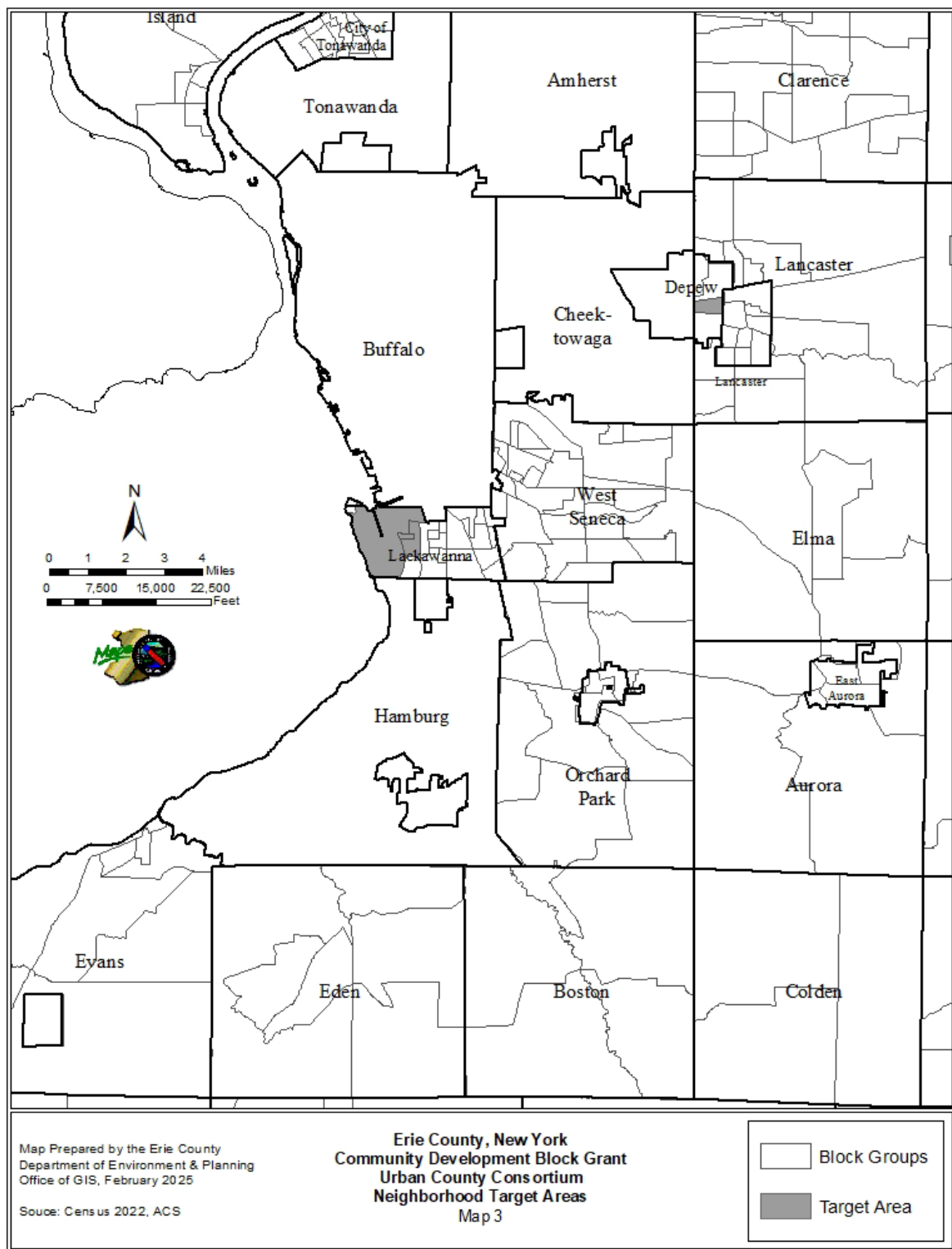
The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population of approximately 313,075) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 69,781, is a member of the HOME consortium not the CDBG consortium.

There is one census tract in the consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate income populations within the consortium. There are a total of 55 income eligible block groups in the Consortium. There are thirteen (13) communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- Northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds



and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.



## Neighborhood Target Areas

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

### Priority Needs

Table 49 – Priority Needs Summary

1	<b>Priority Need Name</b>	Infrastructure (Community Development)
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Water/Sewer/Drainage Improvements CD-1.1 Sidewalk Improvements CD-1.2 Road Improvements CD-1.3
	<b>Description</b>	Improvements to sewer and water service, deteriorated roads – reconstruction and repair, sidewalks, bicycle and vehicular access, and storm drainage and flood protection facilities in targeted low-income neighborhoods.
	<b>Basis for Relative Priority</b>	Outdated and deteriorating infrastructure needs improvement or replacing.
2	<b>Priority Need Name</b>	Public Facilities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Elderly Frail Elderly Persons with Physical Disabilities Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	

	<b>Associated Goals</b>	Public Building and ADA Improvements CD-2.1 Parks/Open Space Facility Improvements CD-2.2 Senior Center Improvements CD-2.3 Commercial Center Improvement CD-2.4 Smart Growth Fund CD-2.5
	<b>Description</b>	Improve and/or expand public facilities that address community needs. Such facilities may include community centers, libraries, and youth centers, parks, recreation, open space facilities, commercial centers, and senior center facilities.
	<b>Basis for Relative Priority</b>	Based on physical inspection and interviews conducted during consultation process, existing public facilities are in need of upgrading and expansion.
<b>3</b>	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Transportation CD 3.1 Fair Housing Services CD 3.2

	<b>Description</b>	Provide senior service program enhancements such as adult day care and senior citizen services, recreation programs for all ages, transportation services for health, income and personal needs and nutrition, employment, supportive housing and transportation. Fill gaps in services, which support community revitalization and enhance the quality of life for low/moderate income residents. Provide fair housing assistance to those who are discriminated against in search of affordable housing.
	<b>Basis for Relative Priority</b>	There continues to be a need for services to increase the effectiveness of physical investments that improve conditions for the elderly and low-income persons.
4	<b>Priority Need Name</b>	Planning/Administration
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Planning Studies/Reports CD-4.1 Administration CD-5.1
	<b>Description</b>	Provide technical assistance and funding for the preparation of plans that direct the area's growth in housing, community development and economic development. Also, costs associated with the management of federal grants.
	<b>Basis for Relative Priority</b>	Urgent need to plan for the orderly growth and revitalization of the Consortium area.

5	<b>Priority Need Name</b>	Business Development
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Micro-Loan Program ED-4.1
	<b>Description</b>	Provide technical assistance and investment capital through business loan funds to assist businesses in preserving and creating new economic opportunities. Develop and implement Microenterprise Loan fund to assist microenterprise businesses. Provide technical assistance and counseling through business assistance directories and company site visits. Provide economic opportunity for low- and moderate-income people by sustaining appropriate workplace facilities.
	<b>Basis for Relative Priority</b>	Business Development through direct technical and business assistance are the catalyst for the retention and creation of new jobs.
6	<b>Priority Need Name</b>	Housing Rehabilitation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Owner Occ. Deferred Loan Program H-1.1 Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2 Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3 Emergency Repair Program H-1.4 Rental Rehabilitation Program H-1.5 Mobile Home Repair Program H-1.6 Utility Connection Program H-1.7 Handicapped Accessibility Program H-1.8 Housing Rehab - Lead Remediation Program H-1.9

	<b>Description</b>	Provide low-interest loans to eligible property owners and mobile homeowners. Rehabilitate rental units by providing low-interest loans to owners of rental units. Additional focus on ensuring all properties are lead-safe with any work disturbing painted surfaces. All houses within identified high radon levels to be tested and remediated if necessary.
	<b>Basis for Relative Priority</b>	High housing costs reduce economic opportunities and access to prosperity, especially among lower-income racial and ethnic minorities across the Erie County Consortium. Renters are much more likely than homeowners to experience housing problems, among whom cost burden is the most prevalent.
7	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Public Building and ADA Improvements CD-2.1 Parks/Open Space Facility Improvements CD-2.2
	<b>Description</b>	Provide affordable healthy and affordable residential opportunities for low- and moderate-income households. Provide financial resources to Community Housing Development Organizations and non-profit groups that seek to develop rental housing for the low-income population.
	<b>Basis for Relative Priority</b>	There is insufficient housing for extremely low- and low-income households in the Erie Consortium. Despite historically low mortgage interest rates, many households who would normally be seeking to buy homes are unable to do so due to tighter lending standards. Increasing affordable housing units will address this need.
8	<b>Priority Need Name</b>	Slum/Blight
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	

	<b>Associated Goals</b>	Remove Slum/Blight SB-1.1
	<b>Description</b>	Improve appearance, safety, and quality of life aspects of geographic areas suffering from slum and blight conditions. Undertake targeted demolition and clearance of buildings and land features which contribute to spot blight conditions and health and safety threats.
	<b>Basis for Relative Priority</b>	The large number of blighted properties detracts from the quality of life for neighboring properties and precludes achieving a suitable living environment.
9	<b>Priority Need Name</b>	Homeless Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Homeless Needs - Rapid Re-Housing Program ESG-1.1 Homeless Needs - Data Collection ESG-1.3 Homeless Needs - Homeless Prevention Prgm ESG-1.2
	<b>Description</b>	Provide homeless assistance through rapid re-housing and prevention services. Projects will provide financial assistance to homeless individuals through payments of rental assistance, security deposits, utility payments, counseling and legal aid services. Emergency shelters for the homeless population will receive financial assistance for operational expenses. The service population is consortium wide for any homeless individual or an individual at risk of becoming homeless.



	<b>Basis for Relative Priority</b>	The homeless population in the consortium continues to rise. There is a high need for homeless assistance services.
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### **Narrative (Optional)**

The table shows priority need within the Consortium. Priority needs were included based on the results of public input, stakeholder meetings and interviews, and discussions with County community development staff members.

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

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The demand for rental assistance continues to be unabated. Most significant is the number of applications outstanding for vouchers. As of September 2024, of the 5,513 vouchers Belmont has issued, 1,240 (22.5%) are held by individuals that are trying to find housing. In June 2024 Belmont was able to open the waiting list for vouchers for the first time since 2011 and subsequently closed it after receiving 9,000 applications within five days. The Rental Assistance Corporation (RAC) has been unable to open the waiting list since receiving 7,000 in 2019 and continuing to carry a backlog.
TBRA for Non-Homeless Special Needs	Belmont Housing Resources of WNY administers the Section 8 program for tenant assistance in Erie County. The Consortium does not plan to utilize funds for Tenant Based Rental Assistance.
New Unit Production	<p>There is a substantial need for affordable housing in the Consortium service area, however the post-pandemic cost-per-unit often requires additional leveraging above and beyond the Consortium's capacity. The Consortium will continue to target its funds toward existing housing rehabilitation and infrastructure improvements to meet the demand.</p> <p>There has been additional funding for affordable housing production resulting from the post-pandemic period. Both HOME-ARP and Erie County ARPA funds have been used to assist in funding seventeen (17) affordable housing projects throughout the county. Six of these projects are within the Erie County CDBG Consortium and will bring 438 new and affordable rental units online once constructed. Though not fully able to meet the great housing demand, bringing 400+ units online within consortium municipalities is a substantial step in the right direction to help house area low- and moderate-income residents.</p> <p>Should additional local, state or federal funding become available for development of new affordable units, the Consortium will also use HUD funds to construct units to the extent feasible.</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Rehabilitation	<p>The Erie County HOME Consortium has identified housing rehabilitation as one of its high priority activities in order to preserve and maintain its affordable housing stock, including mobile homes. The County has made it a priority to use CDBG funds and HOME funds to rehabilitate properties both within and outside of target areas.</p> <p>Under the current Consolidated Plan, from 2020-2024, the County provided assistance to rehabilitate 417 properties, most of which were owner-occupied. Of these, 177 housing units were within target areas. The remainder were outside target areas, generally funded based on applications made to the County. Virtually all the housing was built prior to 1980 and 78% of the properties required mitigation of lead-based paint hazards. Overall, it is estimated that 55% of the units were occupied by senior citizens.</p> <p>Rehabilitation and maintenance of existing housing continues to be one of the most efficient means of improving affordable living choices, particularly in mature first ring suburbs such as the Erie County's HOME Consortium's larger communities near Buffalo where housing costs may be higher. Connecting rehabilitated properties to new infrastructure and weatherization technology is also a priority, particularly in the more rural areas of Erie County.</p>
Acquisition, including preservation	<p>Within the Home Consortium, the American Community Survey estimates that there were 10,022 vacant housing units in 2022. Of these vacancies, 2,915 units were vacant for reasons other than being for sale or for rent, or sold or rented but not occupied for seasonal, recreational or other uses.</p>

**Table 50 – Influence of Market Conditions**

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

### Introduction

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,994,630	437,000	0	3,431,630	13,726,520	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	921,687	215,000	0	1,136,687	4,546,744	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	234,812	0	0	234,812	939,248	

**Table 51 - Anticipated Resources**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

In 2023, projects funded through Erie County's CDBG allocation leveraged \$1,116,209 in matching funds. It is anticipated that similar matching funds will be leveraged annually from 2025 - 2029. The housing and community development needs within the Consortium are substantial and require private/public investment that is independent of any federal HUD resources. In the 2023 program year, projects that were recipients of non-HUD resources that addressed the housing and infrastructure needs identified in the 2020-24 Consolidated Plan had a total investment amount of \$4,044,558. The funding sources for these projects included; USDA – Housing Rehabilitation Program, Lackawanna Community Development Corporation – (LCDC) Housing Rehab Program- New York State Affordable Housing Corporation, Lead Poisoning Prevention – Erie County Dept. of Health, Community Foundation of Greater Buffalo- U.S. Department of HUD, NYS Dept. of Health, Community Foundation of Greater Buffalo, USDA – Guaranteed Mortgage Loan – First Time Homebuyers Loan Program- United States Dept. of Agriculture Section 502/504 Guaranteed.

The County is required to provide a match for federal funds received under the HOME Program. The County will continue to provide Payment in Lieu of Taxes for rental housing that is developed to serve low-income households in Erie County. The difference between the full assessed value for property tax and the amount paid under the PILOT Payment Schedule will be used by the County for the HOME match.

Agencies receiving ESG funds under the County ESG Program will provide a portion of the required ESG match. The County will also use the financial assistance and services the County Department of Social Services provides to the homeless as a match.

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

Buffalo Erie Niagara Land Improvement Corporation (BENLIC) is a resource to the Consortium that identifies units vacant parcels within the community that can undergo foreclosure, rehabilitation, and resale as affordable housing. BENLIC reports an average cost of approximately \$200,000 to bring an individual housing unit on-line, so the math becomes difficult based on affordability standards, without public funding support. That said BENLIC commenced or continued rehabilitating five (5) properties funded in part by the Land Bank Community Revitalization Initiative 4.2 grant through Enterprise Community Partners, Inc. "Round 4.2" of NY Attorney General Grant funds. These properties are blighting proximate property and neighborhoods at-large. In addition, the Corporation completed constructing three (3) single family homes on a single vacant lot improving the fabric of a historic neighborhood that has not seen new construction in over twenty (20) years.

**Discussion**

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

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
LACKAWANNA HOUSING DEVELOPMENT CORP	CHDO	Ownership Rental	Jurisdiction
ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY	Government	Economic Development	Region
People, Inc.	Non-profit organizations	Non-homeless special needs	Region
SOUTHTOWN RURAL PRESERVATION CO	Non-profit organizations	Ownership	Region
Belmont Housing Resources for WNY, Inc.	Non-profit organizations	Rental	Region
HOUSING OPPORTUNITIES MADE EQUAL, INC.	Non-profit organizations	public services	Region
Neighborhood Legal Services	Non-profit organizations	public services	Region
HOMELESS ALLIANCE OF WESTERN NEW YORK	Non-profit organizations	Homelessness	Region
BUFFALO ERIE NIAGARA LAND IMPROVEMENT CORP	Redevelopment authority	Ownership	Region
RURAL TRANSIT SERVICE INC.	Non-profit organizations	public services	Region
PEOPLE COMMUNITY HOUSING DEVELOPMENT CORPORATION	CHDO	Rental	Region

**Table 52 - Institutional Delivery Structure  
Assess of Strengths and Gaps in the Institutional Delivery System**

### Strengths

A major positive of the institutional structure is the long history and relationship between the Erie County Department of Environment and Planning and the thirty-seven HOME Consortium municipalities.

Over thirty years, the various public institutions have worked together to ensure that the Consortium remains a positive structure bound through a variety of governance documents. These include 37 three-year cooperation agreements, memorandum of understanding, and a workable committee structure.

### Gaps

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

- **Community-based organizations.** The region has only two community-based organizations (LHDC and Southtowns Rural Preservation Company) that deliver housing programs with funding through Erie County, HUD, and State housing areas. A geographic gap especially exists in the north and eastern areas. Households in these places can only access funding through the Consortium.
- **CHDOs.** The existing CHDOs have been unable to satisfy the new HUD requirements regarding development experience and organizational capacity. This has created a severe shortage of CHDOs within the Consortium area.
- **Need for additional Community Housing Development Organizations (CHDOs).** Although approximately two CHDOs serve the Consortium area, their focus has too often been on construction of low-income senior housing. Although this is a high need, additional CHDO activity is required to promote family rental housing. This may require establishing new CHDOs or expanding the reference point/priority of existing ones.

Additional information regarding the Institutional Delivery Systems is available in the Unique Appendices.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X	X	X



Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X		
Other			

**Table 53 - Homeless Prevention Services Summary**

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

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

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

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

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

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

Other Street Outreach Services: The Department of Social Services has contracted 211 WNY to serve homeless individuals in need of emergency shelter when DSS-Emergency Housing is closed.

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

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

Healthcare: The Erie County Health Department's Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies. The Community Health Center also does medical assessments of low-income individuals in the community. UB Heals provides medical assessment, treatment, and referrals to the homeless community at various sites throughout the County.

HIV/AIDS: The Planned Parenthood of Buffalo and Erie County Mobile Outreach Unit screens clients for sexually transmitted diseases and other medical needs. Evergreen Health Services provides medical and mental health care.

Life Skills: The CASH coalition (Creating Assets Savings and Hope) continues to operate two "Hope Centers" that provide onsite access to financial management counselors, benefits counselors, and help with filing for the earned income tax credit. Restoration Society operates the Empowerment Academy to teach life skills to the homeless and those diagnosed with a mental health diagnosis. These additional programs provide financial management intervention, counseling services, advice on budgeting and financial problems, and other life skills. The programs include: Consumer Credit Counseling Service of Buffalo, Catholic Charities, Business and Professional Women of Buffalo, and Cornell Cooperative Extension.

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

For Special Needs Populations there is a Single Port of Entry process. The Single Port of Entry process is widespread in Erie County and is used by several county departments. The purpose of the Single Port of Entry process is to have one shared record of each individual seeking some form of assistance through County programs. The tracking system utilizes a single data input process to obtain basic information on each person that can be used across program or departmental lines. Information is available to indicate what services have been or are being provided and tells service providers what other programs or

departments are working with a particular individual. The system is also useful for services provided by organizations that are not part of the County government.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The Homeless Alliance of WNY has developed a 10-year plan for improving services to the homeless population. The plan is made up of fourteen goals, and is divided into four sections, Education and Empowerment, Continuum of Care Coordination, Community Supports, and System Change.

The plan highlights the need for wider awareness and use of mainstream resources and existing community services. It advocates educating consumers, service providers, and the local community to empower people to better access the benefits and services for which they or their clients are eligible.

The Continuum of Care Alignment section includes six goals that aim to improve Erie County's homeless service system. The goals range from developing and codifying systematic approaches for addressing obstacles and meeting gaps to improving data collection and performance measurement efforts.

The Community Supports section contains three goals; 1) Enhance knowledge of existing housing stock in Erie County; 2) Increase availability of safe, adequate, and affordable permanent housing for all populations in all areas of Erie County; and 3) Support the development of local jobs that pay a self-sufficient wage.

Finally, the System Change Section has two goals; 1) Strengthen existing local homeless and poverty related coalitions; and 2) Expand governmental funding for homeless housing, services, and other safety net programs.

The WNY Coalition for the Homeless is an association of service providers and individuals that collaborate on homeless initiatives, advocate for individuals, educate the community, and provides networking opportunities to best serve sheltered and unsheltered homeless in the community.

As noted, there are a limited number of CHDOs serving the Consortium and those CHDOs are often focused on meeting the needs of the low-income senior population. Taking into account the identified demand for additional multi-family affordable units within the Consortium and the limited existing CHDO capacity, there is a need to establish and/or certify new CHDOs and to partner, as needed, to initiate multi-family affordable housing projects.

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

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Water/Sewer/Drainage Improvements CD-1.1	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2750 Persons Assisted
2	Sidewalk Improvements CD-1.2	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$1,150,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2550 Persons Assisted
3	Road Improvements CD-1.3	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$1,100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4500 Persons Assisted
4	Public Building and ADA Improvements CD-2.1	2025	2029	Non-Housing Community Development		Public Facilities Affordable Housing	CDBG: \$650,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Parks/Open Space Facility Improvements CD-2.2	2025	2029	Non-Housing Community Development		Public Facilities Affordable Housing	CDBG: \$500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1750 Persons Assisted
6	Senior Center Improvements CD-2.3	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$950,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6450 Persons Assisted
7	Commercial Center Improvement CD-2.4	2025	2029	Neighborhood Revitalization		Public Facilities	CDBG: \$425,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1700 Persons Assisted  Facade treatment/business building rehabilitation: 18 Business
8	Smart Growth Fund CD-2.5	2025	2029	Neighborhood Revitalization		Public Facilities	CDBG: \$500,000	Public service activities for Low/Moderate Income Housing Benefit: 3200 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Transportation CD 3.1	2025	2029	Non-Housing Community Development		Public Services	CDBG: \$1,425,000	Public service activities for Low/Moderate Income Housing Benefit: 7060 Households Assisted
10	Fair Housing Services CD 3.2	2025	2029	Non-Housing Community Development		Public Services	CDBG: \$360,000	Public service activities for Low/Moderate Income Housing Benefit: 4250 Households Assisted
11	Planning Studies/Reports CD-4.1	2025	2029			Planning/Administration	CDBG: \$50,000	Other: 3 Other
12	Administration CD-5.1	2025	2029	Addministration		Planning/Administration	CDBG: \$3,419,995 HOME: \$568,340 ESG: \$88,050	
13	Micro-Loan Program ED-4.1	2025	2029			Business Development	CDBG: \$200,000	Businesses assisted: 15 Businesses Assisted
14	Owner Occ. Deferred Loan Program H-1.1	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$2,578,155 HOME: \$2,034,347	Homeowner Housing Rehabilitated: 192 Household Housing Unit
15	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$150,000 HOME: \$100,000	Homeowner Housing Rehabilitated: 16 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3	2025	2029	Affordable Housing		Housing Rehabilitation	HOME: \$675,000	Homeowner Housing Rehabilitated: 38 Household Housing Unit
17	Emergency Repair Program H-1.4	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$1,000,000	Homeowner Housing Rehabilitated: 65 Household Housing Unit
18	Rental Rehabilitation Program H-1.5	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$625,000	Rental units rehabilitated: 50 Household Housing Unit
19	Mobile Home Repair Program H-1.6	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$425,000	Rental units rehabilitated: 50 Household Housing Unit
20	Utility Connection Program H-1.7	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$150,000	Rental units rehabilitated: 20 Household Housing Unit
21	Handicapped Accessibility Program H-1.8	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$100,000	Homeowner Housing Rehabilitated: 12 Household Housing Unit
22	Housing Rehab - Lead Remediation Program H-1.9	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$300,000	Homeowner Housing Rehabilitated: 22 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
23	Affordable Housing - CHDO Projects H-2.1	2025	2029	Affordable Housing			HOME: \$1,305,744	Other: 85 Other
24	Affordable Housing - Rental Housing Projects H-2.2	2025	2029	Affordable Housing			HOME: \$1,000,000	Direct Financial Assistance to Homebuyers: 18 Households Assisted
25	Remove Slum/Blight SB-1.1	2025	2029	Clearance and Demolition		Slum/Blight	CDBG: \$100,000	Buildings Demolished: 5 Buildings
26	Homeless Needs - Rapid Re-Housing Program ESG-1.1	2025	2029	Homeless		Homeless Assistance	ESG: \$518,005	Tenant-based rental assistance / Rapid Rehousing: 85 Households Assisted
27	Homeless Needs - Homeless Prevention Prgm ESG-1.2	2025	2029	Homeless		Homeless Assistance	ESG: \$518,005	Homelessness Prevention: 85 Persons Assisted
28	Homeless Needs - Data Collection ESG-1.3	2025	2029	Homeless		Homeless Assistance	ESG: \$50,000	Other: 5 Other

**Table 54 – Goals Summary**

## Goal Descriptions

1	Goal Name	Water/Sewer/Drainage Improvements CD-1.1
	Goal Description	Improve sewer, water and drainage service.



2	<b>Goal Name</b>	Sidewalk Improvements CD-1.2
	<b>Goal Description</b>	Improve sidewalk service for pedestrian safety.
3	<b>Goal Name</b>	Road Improvements CD-1.3
	<b>Goal Description</b>	Improve bicycle and vehicular access to areas of employment, recreation, and commercial activity located in targeted low-income neighborhoods.
4	<b>Goal Name</b>	Public Building and ADA Improvements CD-2.1
	<b>Goal Description</b>	Construct, expand, or improve access to community centers, libraries, and youth centers that serve the low/moderate income population.
5	<b>Goal Name</b>	Parks/Open Space Facility Improvements CD-2.2
	<b>Goal Description</b>	Develop, expand, and rehabilitate park, recreation, and open space facilities that serve low/moderate income residents.
6	<b>Goal Name</b>	Senior Center Improvements CD-2.3
	<b>Goal Description</b>	Expand and improve to senior center facilities given the growing elderly population of the Consortium municipalities.
7	<b>Goal Name</b>	Commercial Center Improvement CD-2.4
	<b>Goal Description</b>	Provide matching grants for the purpose of exterior repairs to improve the physical appearance of older commercial centers in order to improve the quality of life for low- and moderate-income people residing in the surrounding neighborhoods by enhancing the appearance of frequently visited retail structures.
8	<b>Goal Name</b>	Smart Growth Fund CD-2.5
	<b>Goal Description</b>	Investments in infrastructure and public spaces within central business districts to improve the quality of life for low- and moderate-income residents of the surrounding area by providing improved economic activity, walkability, and public amenities.

9	<b>Goal Name</b>	Transportation CD 3.1
	<b>Goal Description</b>	Transportation services for seniors and low-income people to shopping and medical visits.
10	<b>Goal Name</b>	Fair Housing Services CD 3.2
	<b>Goal Description</b>	Provide gap filling housing services that support community revitalization and enhance the quality of life for low/moderate income residents.
11	<b>Goal Name</b>	Planning Studies/Reports CD-4.1
	<b>Goal Description</b>	Provide technical assistance and funding for the preparation of plans that direct the area's growth in housing, community development and economic development.  3 plans prepared.
12	<b>Goal Name</b>	Administration CD-5.1
	<b>Goal Description</b>	Administration
13	<b>Goal Name</b>	Micro-Loan Program ED-4.1
	<b>Goal Description</b>	Develop and implement Microenterprise Loan fund to assist microenterprise businesses and to complement the Commercial Center Improvement program.
14	<b>Goal Name</b>	Owner Occ. Deferred Loan Program H-1.1
	<b>Goal Description</b>	Provide low-interest loans to eligible property owners.
15	<b>Goal Name</b>	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	<b>Goal Description</b>	Provide low-interest loans to eligible property owners withing the Town of West Seneca.

16	<b>Goal Name</b>	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3
	<b>Goal Description</b>	Provide low-interest loans to eligible property owners within the Town of Hamburg.
17	<b>Goal Name</b>	Emergency Repair Program H-1.4
	<b>Goal Description</b>	Establish a quick response repair program that is targeted to low-income households experiencing immediate housing problems.
18	<b>Goal Name</b>	Rental Rehabilitation Program H-1.5
	<b>Goal Description</b>	Rehabilitate rental units by providing low-interest loans to owners of rental units.
19	<b>Goal Name</b>	Mobile Home Repair Program H-1.6
	<b>Goal Description</b>	Provide deferred loans to very low-income mobile homeowners living in mobile home parks and having an emergency housing condition problem.
20	<b>Goal Name</b>	Utility Connection Program H-1.7
	<b>Goal Description</b>	Utility connection program that provides a funding mechanism for households to tie into new infrastructure lines.
21	<b>Goal Name</b>	Handicapped Accessibility Program H-1.8
	<b>Goal Description</b>	Provide a mechanism for handicapped individuals to improve their mobility within their residential unit.
22	<b>Goal Name</b>	Housing Rehab - Lead Remediation Program H-1.9
	<b>Goal Description</b>	Lead remediation program that removes lead within existing residential units.
23	<b>Goal Name</b>	Affordable Housing - CHDO Projects H-2.1
	<b>Goal Description</b>	Provide financial resources to Community Housing Development Organizations that seek to develop rental and owner-occupied housing for the low-income population.

24	<b>Goal Name</b>	Affordable Housing - Rental Housing Projects H-2.2
	<b>Goal Description</b>	Provide financial resources to non-profit groups that seek to develop rental housing for the low-income population.
25	<b>Goal Name</b>	Remove Slum/Blight SB-1.1
	<b>Goal Description</b>	Undertake targeted demolition and clearance of buildings and land features which contribute to spot blight conditions.
26	<b>Goal Name</b>	Homeless Needs - Rapid Re-Housing Program ESG-1.1
	<b>Goal Description</b>	Rapid Re-housing Relocation and Stabilization services provide services to homeless individuals through housing search, counseling and legal aid assistance.
27	<b>Goal Name</b>	Homeless Needs - Homeless Prevention Prgm ESG-1.2
	<b>Goal Description</b>	The ESG Program provides housing assistance to individuals and families who are homeless or in jeopardy of becoming homeless.
28	<b>Goal Name</b>	Homeless Needs - Data Collection ESG-1.3
	<b>Goal Description</b>	Data collected for reporting on the number of people assisted through the HMIS system each year. 5 reports.

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

The Consortium estimates that it will provide affordable housing to 465 extremely low-income, low-income, and moderate-income families over the next five years.

The “Outcome Indicators” for the specific goals listed in SP-45 are generated as a result of the following projected accomplishments:

- Goal 1- Water/Sewer/Drainage Improvements CD-1.1 9 completed projects
- Goal 2- Sidewalk Improvements CD-1.2 11 completed projects
- Goal 3- Road Improvements CD-1.3 12 completed projects

- Goal 4- Public Building and ADA Modification Improvements CD-2.1 8 completed projects
- Goal 5- Parks/Open Space Facility Improvements CD-2.2 7 completed projects
- Goal 6- Senior Center Improvements CD-2.3 12 completed projects
- Goal 7- Smart Growth Fund CD-3.2 5 completed projects

## **SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

There are three public housing authorities that operate within the Erie County Consortium communities; the Lackawanna Municipal Housing Authority (LMHA), which has 396 family units and 94 senior citizen units, the Kenmore Housing Authority (KHA), which has 294 units of designated elderly housing, and the Tonawanda Housing Authority (THA), which has 214 family units and 50 senior units. The LMHA and KHA operate with federal, state and local funding, while the THA does not receive federal funding.

As of the writing of this plan, the three housing authorities were maintaining wait lists. The waiting list for public housing in Kenmore is open indefinitely to elderly or disabled applicants. Preference is given to those living or working in Kenmore. The LMHA waiting list for housing is open. As of September 27, 2022, THA closed its 55 and older waiting lists to new applicants and as of October 14, 2024, it closed its 1 bedroom waiting list to new applicants. All other THA waiting lists are open. As of 11/1/24, THA had a total of 91 applications on its waiting list.

Every public housing provider within the Erie County Consortium Communities provides accessible units targeted to disabled tenants as well as senior facilities. New units are being constructed that will expand the overall number of accessible units, along with rehabilitation of existing units that will make them more accessible. No action has been taken to expand visit ability standards for new units or education to developers on providing better accessibility in proposed projects. All projects must comply with existing ADA and other regulations; however, no action above and beyond that has been taken.

The Tonawanda Housing Authority is in the process of major redevelopment of its current housing inventory. A new senior housing building (to be known as Hillview Commons) will be constructed allowing for demolition of the existing senior housing. All units in Hillview Commons will be handicapped accessible. Once the existing housing is demolished the site will be improved by 4 – 6 accessible units. This project was announced in 2023 and the start of construction is delayed pending resolution of funding issues. Additionally, the remaining housing will undergo full rehabilitation with Phase One being the 62 family units at the Arthur Albright community. In 2026, 150 units at the Colin Kelly community will also be fully renovated. These projects will provide a few additional accessible units along with improving safety and well-being for residents having upgraded living quarters.

### **Activities to Increase Resident Involvements**

With respect to tenant involvement in management, the LMHA Board has two tenant seats on it which provides a direct means for residents to represent their needs. Also, the LMHA has two active tenant councils – Glover Gardens and Baker Homes.

The KHA Board has two members who are elected by the tenants, providing a direct means for residents to represent their needs.

The Tonawanda Housing Authority is funded for its daily operations from the rental income of tenants. The Tonawanda Housing Authority seeks funding for its capital projects from New York State. The Tonawanda Housing Authority has two elected tenant representatives on its Board. Each representative serves a two-year term. Communications with tenants are handled primarily through written correspondence.

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

No

**Plan to remove the 'troubled' designation**

N/A

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

### **Barriers to Affordable Housing**

A joint Analysis of Impediments to Fair Housing Choice was completed in 2024 and submitted to HUD on February 14, 2020 for the Erie County CDBG Consortium; City of Buffalo; Amherst, Cheektowaga, Tonawanda Consortium; and the Town/Village of Hamburg. Barriers to affordable housing identified in the 2019 AI included, lack of supply, unaffordable housing costs, lack of funding, and the Not in My Back Yard (NIMBY) sentiment. An undated AI has been prepared in conjunction with the preparation of the Consolidated Plan. Since the prior AI in 2019, some progress has been made to expand access to affordable housing for residents in Erie County, including use of Federal funding to construct new affordable housing units across Erie County, enforcement of the County Fair Housing Law to provide recourse for residents facing discrimination, and actions by local governments, non-profits, and other organizations to provide additional support for those experiencing homelessness and other populations. In spite of this progress, continued impediments remain. The significant barriers identified in the 2024 AI include:

**Homelessness:** The number of people experiencing homelessness has nearly doubled since 2019, likely driven by the end of the COVID eviction moratorium and increasing housing costs. Suburban and rural communities resist the establishment of shelters and supportive housing to serve this population and restrict development through zoning and regulation. A lack of permanent affordable housing units and vouchers to serve the population in need, and a lack of supportive services such as counseling and education, makes it difficult to transition people out of homelessness.

**Lack of Affordable Housing:** The lack of affordable housing in Erie County is particularly acute in the suburban communities which have the greatest employment opportunities. NIMBYism, zoning restrictions, and other policies make it difficult to provide affordable housing near workplaces and changes in public transportation make it difficult for low income residents who find affordable housing in the City of Buffalo or the inner-ring suburbs to access jobs in the suburbs. Zoning and regulatory barriers limit the supply of multi-family housing, which leads to limited options and an increase in rents for the apartments that are available. Rural areas also lack housing and transportation options, limiting access to employment and services. Access to affordable housing is also limited by an inadequate supply of vouchers and the continued refusal of landlords to accept vouchers.

**Public Impediments:** Zoning and regulatory restrictions, including parking requirements, special use permits, and design guidelines, limit the development of multi-family housing in suburban communities and increase the costs for developments that can proceed, increasing rents and resulting in a lack of housing options. A lack of strict code enforcement has resulted in substandard housing. In addition, there has been an increase in fair housing complaints, particularly in the areas of familial status and source of payment, and enforcement is needed to ensure compliance by landlords. Public transportation, provided by the Niagara Frontier Transportation Authority (NFTA), to areas outside of the City of Buffalo and the inner-ring suburbs tends to be less frequent and accessible and since the



preparation of the 2019 AI, the NFTA has cut routes serving lower-density outer-ring communities. The lack of transportation options creates burdens for suburban and rural populations who lack access to services and employment opportunities.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

*More detail is available in both the Unique Appendices and the Analysis of Impediments to Fair Housing Choice*

The following were identified in the 2024 Analysis of Impediments to Fair Housing Choice, as Strategies the County is utilizing and should continue:

1. Encouraging local jurisdictions to revise ordinances to allow group homes, shelters, and other facilities where appropriate.
2. Support homeless service providers, especially through development of transitional and supportive housing, and expand assistance as funding is available.
3. Utilizing Federal, State, and other funding to support affordable housing development and home rehabilitation across Erie County.
4. Continued outreach and education to landlords on source of payment protections to expand access for Housing Voucher recipients to find housing.
5. Identifying areas for infill and redevelopment to provide housing in proximity to employment, retail, and services.
6. Improving pedestrian and cycling infrastructure to support safe access for residents who do not or cannot drive.
7. Reviewing transit services and revise routes and service times to better connect low-income residents to employment centers and other services, particularly in rural areas of the County.
8. Supporting paratransit and explore options to expand options for rural residents to access needed services and employment without a car.
9. Supporting development of grocery stores and other necessities in underserved areas to provide needed services to residents, especially in rural areas.
10. Encouraging developers to include more 3 or more-bedroom units in projects to expand access for families.
11. Educating landlords and property managers about obligations under Fair Housing Laws to accept vouchers and ensure source of payment is not a barrier for prospective residents.
12. Funding partners and housing organizations to provide counseling, education, and outreach services.
13. Ensuring information is provided in appropriate languages to the growing immigrant and refugee populations across Erie County.
14. Educating landlords about Fair Housing law and requirements and strictly enforce requirements for non-discrimination.
15. Educating realtors about Fair Housing law and requirements.
16. Providing education to tenants about their rights to safe and adequate housing.

17. Outreach and education to landlords on their responsibilities to provide safe, adequate housing and perform necessary maintenance on properties in a timely fashion.

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

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

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

The 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 developing methods and strategies for reaching out to homeless persons and assessing their needs.

Erie County Department of Social Services continues to support programs that help homeless persons including the chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The programs include Emergency Assistance to adults, Emergency Assistance to Families (EAF) and Emergency Safety Net Assistance. The programs provide financial assistance for shelter arrears, security agreements, water shutoff restore, heating equipment repair and replacement, home repairs, moving expenses and storage cost for furniture and personal belongings. These services help homeless persons make the transition to permanent housing and independent living.

The Code Blue program was created in 2009 by the Western New York Coalition for the Homeless to provide a warm place to sleep and eat when the temperature fell below 15 degrees. Since 2015, to respond to Governor Cuomo's Executive Order #151, Erie County's Department of Social Services provided funding for Code Blue when the temperature was 32-16 degrees.

During the Code Blue winter nights, Matt Urban, Restoration Society and St. Luke's provided cots to homeless individuals. From 12/17/2017 to 04/30/2018, a total of 7,913 nightly cots were filled in the Code Blue shelters with approximately 307 unduplicated people. As a result of this program, many hard to serve chronically homeless individuals were identified and engaged. We have housed 48 chronically homeless or highly vulnerable homeless individuals between January 2018 and April 2018. At the time of this reporting, the final numbers have not been tabulated for the most recent winter months.

Recently the HAWNY was awarded a \$3.6 million federal grant to help address youth homelessness in the region. Working with other community partners, the HAWNY will create a comprehensive plan to end youth homelessness in Western New York. The goal is to create a wide range of housing programs, from immediate to transitional to permanent.

The CoC program is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers and State and local governments to

quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

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

To address the needs of homeless persons needing emergency shelter and transitional housing, Erie County continues to provide emergency shelter that serve homeless persons in Erie County. The Erie County Department of Social Services continues to provide assistance to clients through organizations that operate emergency shelters and transitional housing through shelter allowances for the homeless clients.

Erie County ESG program focuses 70% of available funding for rapid re-housing activities, which assists homeless persons living in shelters and places them in permanent housing quickly. This program provides short term rental assistance and case management to stabilize the household in housing.

There are several shelters where homeless persons must be approved for placement in Erie County by DSS before entering the program. These include: Back to Basic, My Place Home, Salvation Army Family Shelter, Faith Based Fellowship, Family Promise, Haven House, a portion of beds at Buffalo City Mission Men's Center (25 beds), and Matt Urban Hope House. In rural areas without any shelter, DSS has to place eligible persons experiencing homelessness in a hotel/motel. If shelters are full, DSS has an obligation to place clients requiring shelter into a hotel/motel.

Benedict House, a transitional housing provider, does community presentations to ensure that persons living with HIV/AIDS are aware of the program. There are three outreach programs, one run by Haven House, another by Hispanics United of Buffalo, and the last by Crisis Services, for women and children who are homeless or at risk of becoming homeless due to domestic violence. Outreach is done in area hospitals, through the criminal justice system, and through three area hotlines. Victims are made aware of area services including emergency shelters and transitional housing providers.

Each year, the CoC conducts a Point-in-Time count of the persons residing in emergency shelters and transitional housing facilities. This information is used to understand the emergency and transitional needs of homeless persons so that they can be addressed adequately and efficiently. The 2019 PIT Count identified 464 homeless persons in emergency shelters and 160 homeless persons in transitional housing facilities. The Housing Inventory List identified 455 beds in emergency shelters and 213 beds in transitional housing. While not all agencies report to the HMIS data set used to populate the Housing Inventory List, the data shows there is continued need for additional emergency and transitional housing beds and facilities.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to**

**permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

Erie County Department of Mental Health administers HUD grants and continues to receive over 6.2 million dollars from the Continuum of Care (CoC). The award administered over 600 Permanent Supported Housing beds through 6 sub-recipients to serve clients who are homeless and have Serious Mental Illness (SMI). There is a Coordinated Entry system in place to prioritize both chronic & pre-chronic homeless clients. This system utilizes a Housing First model; this is a client centered approach that prioritizes providing people experiencing homelessness with permanent housing as quickly as possible, and then providing voluntary supportive services necessary to keep them housed. The Department of Mental Health also has access to 550 beds of supportive housing through New York State that prioritized individuals with serious mental illness and those experiencing homelessness.

During 4/1/2023-03/31/2024, ECDMH assisted 624 people with HUD-funded permanent supportive housing. During this timeframe, 98% maintained this housing or left for other permanent housing destinations. 80% of clients maintained or increased their income. There are increases in the numbers of chronic homeless individuals since 2020, however through community effort, we are heading in the right direction finally this year. During the January 2023 Point In Time, the CoC found 82 chronically homeless people and by 2024 PIT we are estimating 73 CH (Final number not yet published by the CoC). ECDMH participates in bi-weekly Homeless Outreach Meetings that consist of collaboration between shelters, outreach organizations, and mental health staff. As a result of this collaborative effort our community is able to reach unsheltered individuals and better assess their specific needs thus decreasing time in homeless shelters.

The County continues to use Emergency Solutions Grant Program funds to provide financial assistance and services to homeless individuals and families through a Rapid Re-housing Program (RRH). The Program shortens the shelter stay and provides relocation and stabilization services to homeless individuals and families. These services help homeless individuals and families make the transition from living in a shelter to permanent affordable housing. In the County's ESG funded RRH Program, households with children who are victims of domestic violence are prioritized for entry into the program.

In order to stabilize program participants and prevent program participants from becoming homeless again, RRH program participants are required to work with a case worker while receiving program services. Case management services are provided as needed or at a minimum of once per month. Generally, there is 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. The participants graduate and are provided with necessary referrals.

Erie County will maintain coordination and collaboration with local non-profit agencies serving the homeless population and will continue will use its CDBG funds to assist non-profit organizations that serve homeless individuals and families in the region.

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

The 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.

Erie County continues to utilize the Emergency Solutions Grant Program to assist individuals and families at risk of becoming homeless with a Homeless Prevention Program. During the 2018 Program Year, the program prevented 28 singles and 1 household with 2 children from becoming homeless. This program includes case management for housing relocation and stabilization services along with financial assistance for rent and other eligible housing expenses to individuals and families at risk of becoming homeless. Restoration Society, Inc. administers the County's Emergency Solution Grant Program which started in January 2013. Since the program started, 48 singles and 23 households with 36 adults and 61 children in those households have received financial assistance through this program.

Erie County DSS also provides financial assistance and services to prevent homelessness. The Department's Emergency Service Team assists individuals and families at risk of homelessness with financial assistance for rent and utilities arrears, helping families remain housed.

The Erie County Office of Child and Family Services ensures that any child leaving foster care is placed in appropriate housing. Appropriate housing is considered apartments, small boarding homes, housing with friends or family, but does not include a shelter, SRO, or congregate living with more than 10 individuals.

Funding made available through United Way of Buffalo & Erie County's federal Emergency Food and Shelter Program (EFSP) provided households in Erie County with financial assistance for utilities and rent/mortgage payments to help prevent homelessness. The organizations that provided the services

include: American Red Cross (ARC), Buffalo Urban League (through ARC), Buffalo City Mission, Community Action Organization (through ARC), Community Services for the Dev. Disabled (through ARC), Compass House (through ARC), Evergreen Health Services (through ARC), Lt. Col. Matt Urban Human Services (through ARC), and The Salvation Army.

Several programs help with transportation or bus tokens for individuals searching for housing, commuting to the workplace, or receiving services. These programs include the Erie County Department of Social Services Welfare Diversion, Medicaid Transportation, and the Independent Living Center.

As referenced previously in this section, the recent grant award to the HAWNY to create a comprehensive plan to end youth homelessness in Western New York will develop a wide range of housing programs, from immediate to transitional to permanent.

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

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

*More detail available in the Unique Appendices*

Actions to combat lead poisoning in Erie County, include:

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

Between 1/1/23 and 12/31/23 this program completed 1,039 visual assessments for the presence of potential lead paint hazards and made 93 referrals for blood testing or children. 169 referrals were made for blood testing assistance, additional inspection, enhanced home education and interventions.

LEADSAFE Erie County Lead Hazard Control Program: In 2023, 41 properties were assessed for lead hazards and 76 units were made lead-safe under this program.

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

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

Lead Poisoning Primary Prevention Program: The strategy is to identify pre-1978 homes and provide remediation prior to LBP hazards developing. The program focuses on 1, 2, 3 and 4 unit family homes in 11 zip codes identified by the NYS DOH as “Communities of Concern” for lead poisoning. Within this area, the ECDOH designates neighborhoods as “Areas of High Risk” which receive concentrated intervention, including exterior inspection of all homes, and in some cases an interior inspection and a lead education visit for the occupant. Repairs of identified lead hazards are required. Lead Primary also works with Section 8 Housing inspectors and owners using Section 8 to take action to remediate property prior to Section 8 occupancy. Between 1/1/23 and 12/31/23, this program completed 302 exterior risk assessments and confirmed visual clearance of 528 exterior units, and completed 516 interior assessments with 382 interior clearances. 904 investigations were closed and 271 post-remediation dust samples were cleared.

Childhood Lead Poisoning Primary Prevention Program: Lead testing is provided for children under the age of 6 who require a test but cannot obtain one due to lack of insurance coverage. 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.

Lead Safe Work Practices Training for Homeowners (Renovation, Repair & Painting (RRP) Program):

Taking a County sponsored training program is required for anyone who is planning to work on a house with County funds to mitigate LBP hazards. The County sponsors three to five training sessions per month.

Awareness, Education, and Prevention: The Department of Health continues work with its long-standing relationship with the nonprofit Community Foundation of Greater Buffalo. CFGB does significant outreach efforts, networks with various agencies and partners with others in lead-based paint prevention.

**How are the actions listed above related to the extent of lead poisoning and hazards?**

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

The most important role for the Erie County Department of Health is to respond immediately to every call received about a lead-based paint hazard risk and to take appropriate remedial action.

The second basic responsibility of Erie County DOH is to undertake outreach efforts to specifically identify properties which have lead-based paint risk hazards or are appropriate for lead-based paint prevention. The above programs involved in these activities service about 3000 households per year, with a significant concentration in 12 high-risk Census tracts, mostly within the City of Buffalo.

Awareness, Education and Prevention are critical to making the broader public aware of lead-based paint hazards, and also to increasing their awareness of how to prevent lead-based paint hazards. The Community Foundation of Greater Buffalo has and continues to play a critical role in this effort. Also, the training program under the Removal, Remodel, Painters Program (RRP) reaches about 2500 participants per year, well beyond the number who are seeking assistance through County rehab programs.

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

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 intake for housing rehabilitation programs. Brochures, including "Protect Your Family from Lead in Your Home" from the EPA 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 ("Reducing Lead Hazards When Remodeling Your Home")

by HUD). A community program, “Lead Hazard Control Training” offered by Lead Connections, is also recommended for applicants and potential applicants.

In all of its housing assistance programs, the Consortium will evaluate all properties built prior to 1978 and require remediation where lead-based paint hazards are present. All rehabilitation housing applications submitted for County Assistance are reviewed for the lead-based paint risk assessment. Compliance includes visual assessments, verbal questioning during the intake and written questions on the application form. All housing cases include a visual assessment for lead-based paint hazards, including peeling, cracking, chipping or flaking paint.

If the unit meets the LBP hazard threshold, an outside environmental specialist (procured through an RFP process with the County) performs a risk assessment to assess the condition in detail and specify any remediation action required. Upon completion of remediation, by a separate lead-certified contractor, the same environmental specialist performs a clearance inspection.

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

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

The 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 economic impact of the COVID-19 pandemic has made it more important than ever to implement comprehensive strategies aimed at reducing poverty and improving the quality of life for vulnerable populations. In response, Erie County has developed a multifaceted approach that includes both immediate relief and long-term systemic change, targeting areas such as affordable housing, workforce development, access to healthcare, and education.

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

*More detail available in the Unique Appendices*

Affordable Housing Initiatives: A primary focus of Erie County's strategy for reducing poverty is improving access to affordable housing. In many urban and suburban areas, rising rents and limited housing options have left low-income families with few affordable choices. In response, Erie County has prioritized affordable housing development through partnerships with local developers, nonprofits, and state agencies.

Erie County annual HOME funds play a key role in supporting new affordable housing projects, particularly in areas with high concentrations of poverty. Additionally, the county has leveraged state and federal funding to offer rental assistance programs and homeownership assistance to low-income families.

Employment Programs: The county has invested in job training programs, partnerships with local community colleges, and career development services to enhance employment opportunities for low-income residents.

The Erie County Workforce Development Consortium (ECWDC) is a key player in connecting job seekers with employers in high-demand industries such as healthcare, manufacturing, and technology. Furthermore, the county has also worked to improve access to education for individuals who may have dropped out of school or lack the basic credentials required for employment.

Access to Healthcare: To help alleviate the burden of healthcare costs, Erie County has expanded access to health services through public health programs and partnerships with local healthcare providers.

Additionally, the Erie County Department of Health works to address broader social determinants of health, such as nutrition and housing instability, which are closely linked to poverty. The county has launched programs aimed at improving maternal and child health, reducing chronic diseases, and ensuring that underserved communities have access to affordable and culturally competent healthcare.

Education and Early Childhood Development: Erie County has prioritized improving educational opportunities for low-income families, particularly in early childhood education. The county has partnered with local school districts, Head Start programs, and nonprofit organizations to ensure that children in poverty have access to quality early education, which is vital for long-term academic and economic success.

Through the Erie County Youth Bureau, the county has also invested in after-school programs, mentoring, and academic enrichment activities designed to support at-risk youth and help them stay on track academically.

Social Services and Financial Assistance: Erie County continues to offer a variety of social services aimed at providing short-term financial relief and long-term stability. Programs like Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and the Low-Income Energy Assistance Program (LIHEAP) help provide financial support for food, utilities, childcare, and housing, all of which can be significant barriers to escaping poverty.

The county also offers financial literacy programs aimed at helping families build financial independence and avoid predatory lending practices. By teaching budgeting, saving, and debt management, these programs aim to help families improve their financial stability in the long term.

Collaboration with Nonprofits and CBOs: Erie County's poverty reduction strategy is strengthened by its collaboration with local nonprofits, community-based organizations, and advocacy groups. These organizations often have the ability to reach families in need with services tailored to their specific situations. They play a vital role in providing food, housing, legal services, and other critical support.

## **SP-80 Monitoring - 91.230**

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

The following describes the standards and procedures Erie County uses to monitor its housing and community development activities. This ensures long term compliance with program and comprehensive plan requirements.

### Housing

A monthly housing report is prepared by the CDBG administrative staff. This document notes payouts, current balances, and other items useful to the housing management section. Examples of program design items that ensure long term compliance with other program requirements include the following:

- Annual spot residency and income checks on housing and Rental Rehabilitation recipients;
- Monitoring of Community Housing Development Organization (CHDO) projects to ensure compliance with income eligibility, rents, and other HOME requirements;
- Annual update of the Erie County Housing Program Policy and Procedures Manual;
- Annual preparation of the Consolidated Annual Performance Report (CAPER) that includes a thorough review of housing program performance relative to five-year housing goals;
- Preparation of Annual Status Report to the County's Impediments to Fair Housing report.

### Community Development

Staff meets monthly to review progress and ensures that projects are moving along earnestly and swiftly. Annual letters are forwarded to mayors and supervisors representing municipalities where progress has been slow. This provides a good benchmark concerning developing issues/concerns. Examples of program design items that ensure long-term compliance with program requirements include the following:

- Preparation of annual MBE/WBE Contracting/Sub-contracting report to the federal Department of Housing and Urban Development (HUD). This document is reviewed by the County's Office of Equal Employment Opportunity to insure consistency with County Policy;
- Preparation of the semi-annual Labor Standards Report for submittal to HUD;
- A County monitor is assigned to each community in order to provide "hands on" assistance when preparing applications for CDBG funds. This ensures that eligibility, Davis-Bacon, MBE/WBE, and other federal requirements are understood by sub-recipient local governments;

- On-going Community Project monitoring table is maintained by program staff and reviewed at monthly update meetings. This serves as a good tracking tool to monitor each project's progress through the various CDBG procedural steps.

#### Specific Sub-Recipient Monitoring

A subrecipient monitoring checklist will continue to be used in 2025 - 2029. It is the intention of Erie County to conduct a minimum of two off-site sub-recipient monitoring reviews annually. Specifically, Erie County will continue to monitor the Town of Hamburg.

# Erie County FY 2025 Annual Action Plan

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## Expected Resources

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

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,994,630.00	437,000.00	0.00	3,431,630.00	13,726,520.00	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	921,686.76	215,000.00	0.00	1,136,686.76	4,546,744.00	



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	234,812.00	0.00	0.00	234,812.00	939,248.00	

**Table 55 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

In 2023, projects funded through Erie County's CDBG allocation leveraged \$1,116,209 in matching funds. It is anticipated that similar matching funds will be leveraged annually from 2025 - 2029. The housing and community development needs within the Consortium are substantial and require private/public investment that is independent of any federal HUD resources. In the 2023 program year, projects that were recipients of non-HUD resources that addressed the housing and infrastructure needs identified in the 2020-24 Consolidated Plan had a total investment amount of \$4,044,558. The funding sources for these projects included; USDA – Housing Rehabilitation Program, Lackawanna Community Development Corporation – (LCDC) Housing Rehab Program- New York State Affordable Housing Corporation, Lead Poisoning Prevention – Erie County Dept. of Health, Community Foundation of Greater Buffalo- U.S. Department of HUD, NYS Dept. of Health, Community Foundation of Greater Buffalo, USDA – Guaranteed Mortgage Loan – First Time Homebuyers Loan Program- United States Dept. of Agriculture Section 502/504 Guaranteed.

The County is required to provide a match for federal funds received under the HOME Program. The County will continue to provide Payment in

Lieu of Taxes for rental housing that is developed to serve low-income households in Erie County. The difference between the full assessed value for property tax and the amount paid under the PILOT Payment Schedule will be used by the County for the HOME match.

Agencies receiving ESG funds under the County ESG Program will provide a portion of the required ESG match. The County will also use the financial assistance and services the County Department of Social Services provides to the homeless as a match.

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

Buffalo Erie Niagara Land Improvement Corporation (BENLIC) is a resource to the Consortium that identifies units vacant parcels within the community that can undergo foreclosure, rehabilitation, and resale as affordable housing. BENLIC reports an average cost of approximately \$200,000 to bring an individual housing unit on-line, so the math becomes difficult based on affordability standards, without public funding support. That said BENLIC commenced or continued rehabilitating five (5) properties funded in part by the Land Bank Community Revitalization Initiative 4.2 grant through Enterprise Community Partners, Inc. "Round 4.2" of NY Attorney General Grant funds. These properties are blighting proximate property and neighborhoods at-large. In addition, the Corporation completed constructing three (3) single family homes on a single vacant lot improving the fabric of a historic neighborhood that has not seen new construction in over twenty (20) years.

**Discussion**

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
<b>1</b>	Sidewalk Improvements CD-1.2	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$310,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4588 Persons Assisted
<b>2</b>	Road Improvements CD-1.3	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$155,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1865 Persons Assisted
<b>3</b>	Public Building and ADA Improvements CD-2.1	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$119,685.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1755 Persons Assisted
<b>4</b>	Parks/Open Space Facility Improvements CD-2.2	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$155,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 695 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Senior Center Improvements CD-2.3	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$420,620.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13795 Persons Assisted
6	Commercial Center Improvement CD-2.4	2025	2029	Neighborhood Revitalization		Public Facilities	CDBG: \$75,000.00	Facade treatment/business building rehabilitation: 5 Business
7	Transportation CD 3.1	2025	2029	Non-Housing Community Development		Public Services	CDBG: \$293,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 1696 Persons Assisted
8	Fair Housing Services CD 3.2	2025	2029	Non-Housing Community Development		Public Services	CDBG: \$69,436.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1150 Persons Assisted
9	Administration CD-5.1	2025	2029	Addministration		Planning/Administration	CDBG: \$596,599.00 HOME: \$92,168.00 ESG: \$17,610.00	
10	Micro-Loan Program ED-4.1	2025	2029			Business Development	CDBG: \$112,000.00	Businesses assisted: 5 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Owner Occ. Deferred Loan Program H-1.1	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$593,025.00 HOME: \$678,269.00	Homeowner Housing Rehabilitated: 58 Household Housing Unit
12	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$50,000.00 HOME: \$113,930.00	Homeowner Housing Rehabilitated: 10 Household Housing Unit
13	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3	2025	2029	Affordable Housing		Housing Rehabilitation	HOME: \$114,058.00	Homeowner Housing Rehabilitated: 7 Household Housing Unit
14	Emergency Repair Program H-1.4	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$175,000.00	Homeowner Housing Rehabilitated: 12 Household Housing Unit
15	Rental Rehabilitation Program H-1.5	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$121,265.00	Rental units rehabilitated: 10 Household Housing Unit
16	Mobile Home Repair Program H-1.6	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$86,000.00	Homeowner Housing Rehabilitated: 14 Household Housing Unit
17	Housing Rehab - Lead Remediation Program H-1.9	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$100,000.00	Homeowner Housing Rehabilitated: 6 Household Housing Unit
18	Affordable Housing - CHDO Projects H-2.1	2025	2029	Affordable Housing		Affordable Housing	HOME: \$138,252.00	Direct Financial Assistance to Homebuyers: 2 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	Homeless Needs - Rapid Re-Housing Program ESG-1.1	2025	2029	Homeless		Homeless Assistance	ESG: \$127,129.00	Tenant-based rental assistance / Rapid Rehousing: 26 Households Assisted
20	Homeless Needs - Homeless Prevention Prgm ESG-1.2	2025	2029	Homeless		Homeless Assistance	ESG: \$85,477.00	Homelessness Prevention: 24 Persons Assisted
21	Homeless Needs - Data Collection ESG-1.3	2025	2029	Homeless		Homeless Assistance	ESG: \$10,000.00	Other: 1 Other

Table 56 – Goals Summary

## Goal Descriptions

1	Goal Name	Sidewalk Improvements CD-1.2
	Goal Description	Sidewalk replacement in the Village of Angola and City of Tonawanda.
2	Goal Name	Road Improvements CD-1.3
	Goal Description	Road Paving improvements in the City of Lackawanna.
3	Goal Name	Public Building and ADA Improvements CD-2.1
	Goal Description	ADA improvements at public facilities in the Towns of Sardinia and Eden.
4	Goal Name	Parks/Open Space Facility Improvements CD-2.2
	Goal Description	Park and recreational improvements in the Town of West Seneca.

5	<b>Goal Name</b>	Senior Center Improvements CD-2.3
	<b>Goal Description</b>	Senior Center improvements in the Towns of Orchard Park, Grand Island, Lancaster, Aurora and North Collins.
6	<b>Goal Name</b>	Commercial Center Improvement CD-2.4
	<b>Goal Description</b>	Commercial Center improvements in the Village of Akron.
7	<b>Goal Name</b>	Transportation CD 3.1
	<b>Goal Description</b>	Rural Transit transportation services for senior citizens and low to moderate income residents.
8	<b>Goal Name</b>	Fair Housing Services CD 3.2
	<b>Goal Description</b>	Fair Housing services provided by Belmont Housing Resources and Housing Opportunities Made Equal.
9	<b>Goal Name</b>	Administration CD-5.1
	<b>Goal Description</b>	Administrative expenses associated with the management of the CDBG, HOME and ESG grant programs.
10	<b>Goal Name</b>	Micro-Loan Program ED-4.1
	<b>Goal Description</b>	Micro Loan/Grant program for small businesses with owners who reside in income eligible households.
11	<b>Goal Name</b>	Owner Occ. Deferred Loan Program H-1.1
	<b>Goal Description</b>	Housing rehab program for Consortium wide and target areas.
12	<b>Goal Name</b>	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	<b>Goal Description</b>	Housing rehab program in the Town of West Seneca.
13	<b>Goal Name</b>	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3
	<b>Goal Description</b>	Housing rehab program in the Town of Hamburg.
14	<b>Goal Name</b>	Emergency Repair Program H-1.4
	<b>Goal Description</b>	Emergency housing rehab program.
15	<b>Goal Name</b>	Rental Rehabilitation Program H-1.5
	<b>Goal Description</b>	Rental housing rehab program.



16	<b>Goal Name</b>	Mobile Home Repair Program H-1.6
	<b>Goal Description</b>	Mobile home rehab program.
17	<b>Goal Name</b>	Housing Rehab - Lead Remediation Program H-1.9
	<b>Goal Description</b>	Lead remediation home repair program.
18	<b>Goal Name</b>	Affordable Housing - CHDO Projects H-2.1
	<b>Goal Description</b>	Construction of affordable housing units in the City of Lackawanna.
19	<b>Goal Name</b>	Homeless Needs - Rapid Re-Housing Program ESG-1.1
	<b>Goal Description</b>	ESG- Rapid Re-Housing services.
20	<b>Goal Name</b>	Homeless Needs - Homeless Prevention Prgm ESG-1.2
	<b>Goal Description</b>	ESG- Homeless Prevention services.
21	<b>Goal Name</b>	Homeless Needs - Data Collection ESG-1.3
	<b>Goal Description</b>	ESG- Data Collection Services.

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

### Introduction

The following project information for FY 2025 provides a comprehensive overview on the ranges of CDBG, HOME, and ESG activities.

#	Project Name
1	CDBG25- Program Administration
2	HOME25-Program Administration
3	HESG25 - Rapid Re-Housing/Prevention/Data Collection/Admin
4	H25 - Fair Housing- Housing Opportunities Made Equal
5	H25 - Fair Housing Support Services - Housing Counseling - Belmont Shelter Corp.
6	H25-CDBG/HOME Consortium Owner Occupied Housing Rehab Program
7	H25-CDBG/HOME Consortium Owner Occupied Rehab Program
8	H25 - CDBG/HOME West Seneca Housing Rehab Loan Program
9	H25- CDBG/HOME West Seneca Housing Rehab Loan Program
10	HOME25-Hamburg-Homeowner Rehab
11	H25-Emergency Rehab Program
12	H25-Rental Rehab Program
13	H25-Mobile Home Repair Program
14	H25-Lead Abatement Program
15	HOME25- CHDO Projects
16	ED25-Commercial Center Improvement Program - CCIP
17	ED25-Micro-Loan Program Program Income
18	CP25 - C. Lackawanna Kirby Avenue Reconstruction Project Phase 2
19	CP25 T. Sardinia Town Hall Elevator
20	CP25- V. Angola - High and York Street Sidewalk Replacement
21	CP25- T. Orchard Park - Senior Center Improvements
22	CP25-Rural Transit Services
23	CP25-T. Grand Island - Senior Center Improvements
24	CP25- T. Lancaster - Senior Center Improvements
25	CP25 - T. Eden - Schwartz Field - ADA Improvements
26	CP25 - C. Tonawanda - Sidewalk Replacement
27	CP25- T. West Seneca - Fireman's Park Playground Improvements
28	CP25- T. Aurora - Senior Center Improvements
29	CP25- T. North Collins - Senior Center - Generator Installation

**Table 57 – Project Information**

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

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and

Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG consortium.

There is one census tract in the consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate income populations within the consortium. There are a total of 64 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

**2025 YEAR - CONSOLIDATED BUDGET SORTED**

Project #	PROGRAMMED PROJECTS	HOME	CDBG-Admin	Emergency Solutions	Community Project	Economic Development	Project Support	Housing-CDBG	Future/ Program Income	Prior Year Funds	Other Funds	Total
1	CDBG25- Program Administration		\$ 596,599.00									\$ 596,599.00
2	HOME25 - Program Administration	\$ 92,168.00										\$ 92,168.00
3	ESG25 - Program Administration			\$ 17,610.00								\$ 17,610.00
4	H25 - Fair Housing- Housing Opportunities Made Equal							\$ 42,720.00				\$ 42,720.00
5	H25 - Housing Support Services - Housing Counseling - Belmont Shelter Corp.							\$ 26,716.00				\$ 26,716.00
6	H25 - CDBG Consortium Owner Occupied Housing Rehab Program							\$ 288,025.00	\$ 305,000.00			\$ 593,025.00
7	H25 - HOME Consortium Owner Occupied Housing Rehab Program	\$ 478,269.76							\$ 200,000.00			\$ 678,269.76
8	H25 - CDBG West Seneca Housing Rehab Loan Program							\$ 30,000.00	\$ 20,000.00			\$ 50,000.00
9	H25 - HOME- West Seneca Homeowner Rehab	\$ 98,939.00							\$ 15,000.00			\$ 113,939.00
10	HOME25 - Hamburg - Homeowner Rehab	\$ 114,058.00										\$ 114,058.00
11	H25 - Emergency Rehab Program							\$ 175,000.00				\$ 175,000.00
12	H25 - Rental Rehab Program							\$ 121,265.00				\$ 121,265.00
13	H25 - Mobile Home Repair Program							\$ 86,000.00				\$ 86,000.00
14	H25- Lead Abatement Program							\$ 100,000.00				\$ 100,000.00
15	HOME25 - CHDO Projects	\$ 138,252.00										\$ 138,252.00
16	ED25- Commercial Center Improvement Program- (CCIP)					\$ 75,000.00					\$ 75,000.00	\$ 150,000.00
17	ED25- ECIDA- Micro-Loan Program Program Income								\$ 112,000.00			\$ 112,000.00
18	CP25 - C. Lackawanna - Kirby Avenue Reconstruction Project - Phase 2				\$ 150,000.00		\$ 5,000.00				\$ 542,827.00	\$ 697,827.00
19	CP25 - T. Sardinia - Town Hall ADA Improvements				\$ 63,050.00		\$ 3,000.00				\$ 63,050.00	\$ 129,100.00
20	CP25 - V. Angola - High and York Streets Sidewalk Replacement				\$ 150,000.00		\$ 5,000.00				\$ 25,000.00	\$ 180,000.00
21	CP25 - T. Orchard Park - Senior Center Improvements				\$ 30,560.00		\$ 2,500.00				\$ 10,186.00	\$ 43,246.00
22	CP25- Rural Transit Service				\$ 283,000.00		\$ 10,000.00				\$ 953,380.00	\$ 1,246,380.00
23	CP25- T. Grand Island- Senior Center Improvements				\$ 98,360.00		\$ 3,000.00				\$ 47,295.00	\$ 148,655.00
24	CP25- T. Lancaster - Senior Center Improvements				\$ 150,000.00		\$ 5,000.00				\$ 8,261.00	\$ 163,261.00
25	CP25 - T. Eden - Schwartz Field- ADA Improvements				\$ 50,635.00		\$ 3,000.00				\$ 2,665.00	\$ 56,300.00
26	CP25 - C. Tonawanda - Sidewalk Replacement				\$ 150,000.00		\$ 5,000.00				\$ 51,050.00	\$ 206,050.00
27	CP25 - T- West Seneca- Fireman's Park Playground Improvements				\$ 150,000.00		\$ 5,000.00				\$ 159,544.00	\$ 314,544.00
28	CP25- T. Aurora- Senior Center Improvements				\$ 100,700.00		\$ 4,000.00				\$ 5,300.00	\$ 110,000.00
29	CP25- T. North Collins- Senior Center- Generator Installation				\$ 24,500.00		\$ 2,000.00				\$ -	\$ 26,500.00
3	ESG25- Rapid Re-Housing Rental Assistance			\$ 103,601.00							\$ 55,085.00	\$ 158,686.00
3	ESG25- Homeless Prevention Rental Assistance			\$ 103,601.00							\$ 55,085.00	\$ 158,686.00
3	ESG25- HMIS Data Collection			\$ 10,000.00							\$ 10,000.00	\$ 20,000.00
	TOTAL	\$ 921,686.76	\$ 596,599.00	\$ 234,812.00	\$ 1,400,805.00	\$ 75,000.00	\$ 52,500.00	\$ 869,726.00	\$ 652,000.00	\$ -	\$ 2,063,728.00	\$ 6,866,856.76
			\$ 2,994,630.00									

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

1	<b>Project Name</b>	CDBG25- Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Administration CD-5.1
	<b>Needs Addressed</b>	Planning/Administration
	<b>Funding</b>	CDBG: \$596,599.00
	<b>Description</b>	Administration funds for CDBG grant.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
2	<b>Project Name</b>	HOME25-Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Planning/Administration
	<b>Funding</b>	HOME: \$92,168.00
	<b>Description</b>	Administrative funds for HOME grant.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
3	<b>Project Name</b>	HESG25 - Rapid Re-Housing/Prevention/Data Collection/Admin
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeless Needs - Rapid Re-Housing Program ESG-1.1 Homeless Needs - Homeless Prevention Prgm ESG-1.2 Homeless Needs - Data Collection ESG-1.3
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	ESG: \$234,812.00

	<b>Description</b>	HESG Services for Rapid Re-Housing/Prevention/Data Collection/Admin
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	H25 - Fair Housing- Housing Opportunities Made Equal
	<b>Target Area</b>	
	<b>Goals Supported</b>	Fair Housing Services CD 3.2
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$42,720.00
	<b>Description</b>	Fair housing services.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	H25 - Fair Housing Support Services - Housing Counseling - Belmont Shelter Corp.
	<b>Target Area</b>	
	<b>Goals Supported</b>	Fair Housing Services CD 3.2
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$26,716.00
	<b>Description</b>	Fair housing services.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>6</b>	<b>Project Name</b>	H25-CDBG/HOME Consortium Owner Occupied Housing Rehab Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Owner Occ. Deferred Loan Program H-1.1
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$593,025.00
	<b>Description</b>	Housing rehab program - consortium wide - CDBG
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	H25-CDBG/HOME Consortium Owner Occupied Rehab Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Owner Occ. Deferred Loan Program H-1.1
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	HOME: \$678,269.76
	<b>Description</b>	Housing Rehab Program - Consortium Wide - HOME
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>8</b>	<b>Project Name</b>	H25 - CDBG/HOME West Seneca Housing Rehab Loan Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	<b>Needs Addressed</b>	Housing Rehabilitation



	<b>Funding</b>	CDBG: \$50,000.00
	<b>Description</b>	Housing rehab program in the Town of West Seneca- cdbg
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
9	<b>Project Name</b>	H25- CDBG/HOME West Seneca Housing Rehab Loan Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	HOME: \$113,939.00
	<b>Description</b>	Housing rehab program in the Town of West Seneca- home
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
10	<b>Project Name</b>	HOME25-Hamburg-Homeowner Rehab
	<b>Target Area</b>	
	<b>Goals Supported</b>	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	HOME: \$114,058.00
	<b>Description</b>	Housing rehab program in the Town of Hamburg
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>11</b>	<b>Project Name</b>	H25-Emergency Rehab Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Emergency Repair Program H-1.4
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$175,000.00
	<b>Description</b>	Emergency repair housing rehab program
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>12</b>	<b>Project Name</b>	H25-Rental Rehab Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Rental Rehabilitation Program H-1.5
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$121,265.00
	<b>Description</b>	Rental rehab housing program
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>13</b>	<b>Project Name</b>	H25-Mobile Home Repair Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Mobile Home Repair Program H-1.6
	<b>Needs Addressed</b>	Housing Rehabilitation

	<b>Funding</b>	CDBG: \$86,000.00
	<b>Description</b>	Mobile home repair program
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>14</b>	<b>Project Name</b>	H25-Lead Abatement Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehab - Lead Remediation Program H-1.9
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$100,000.00
	<b>Description</b>	Housing rehab lead remediation
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>15</b>	<b>Project Name</b>	HOME25- CHDO Projects
	<b>Target Area</b>	
	<b>Goals Supported</b>	Affordable Housing - CHDO Projects H-2.1
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$138,252.00
	<b>Description</b>	Construction of affordable housing.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>16</b>	<b>Project Name</b>	ED25-Commercial Center Improvement Program - CCIP
	<b>Target Area</b>	
	<b>Goals Supported</b>	Commercial Center Improvement CD-2.4
	<b>Needs Addressed</b>	Business Development
	<b>Funding</b>	CDBG: \$75,000.00
	<b>Description</b>	Exterior improvements to businesses in income eligible areas.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>17</b>	<b>Project Name</b>	ED25-Micro-Loan Program Program Income
	<b>Target Area</b>	
	<b>Goals Supported</b>	Micro-Loan Program ED-4.1
	<b>Needs Addressed</b>	Business Development
	<b>Funding</b>	CDBG: \$112,000.00
	<b>Description</b>	50/50 marching grant-loan program for small businesses where the owner resides in a low to moderate income household.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>18</b>	<b>Project Name</b>	CP25 - C. Lackawanna Kirby Avenue Reconstruction Project Phase 2
	<b>Target Area</b>	
	<b>Goals Supported</b>	Road Improvements CD-1.3

	<b>Needs Addressed</b>	Infrastructure (Community Development)
	<b>Funding</b>	CDBG: \$155,000.00
	<b>Description</b>	Installation of new roadway sub-base and asphalt surfacing along the full length of Kirby Avenue. Installation of new turf and roadway signage.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
19	<b>Project Name</b>	CP25 T. Sardinia Town Hall Elevator
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Building and ADA Improvements CD-2.1
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$66,050.00
	<b>Description</b>	Modernize elevator to make Town Hall handicapped accessible
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
20	<b>Project Name</b>	CP25- V. Angola - High and York Street Sidewalk Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Sidewalk Improvements CD-1.2
	<b>Needs Addressed</b>	Infrastructure (Community Development)
	<b>Funding</b>	CDBG: \$155,000.00
	<b>Description</b>	Removal and replacement of approximately 1,155 feet of ADA handicap compliant sidewalk on the west and east sides of High Street from Commercial Street to Lake Street and along the south side of York Street from South Main to 61 York Street.

	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
21	<b>Project Name</b>	CP25- T. Orchard Park - Senior Center Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior Center Improvements CD-2.3
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$33,060.00
	<b>Description</b>	A Sonance 6-inch ceiling speaker, a JBL Professional VMA1240 Series Mixer Amplifier, a Shure Wireless Handheld Microphone, 3 86-inch TV Screens, 2 stainless steel commercial work tables and the floor in the dance/exercise room will be refinished.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
22	<b>Project Name</b>	CP25-Rural Transit Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Transportation CD 3.1
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$293,000.00
	<b>Description</b>	Funding for transportation services for the low income and elderly population of 25 municipalities including the Towns of Aurora, Akron, Angola, Brant, Boston, Clarence, Colden, Collins, Concord, East Aurora, Eden, Elma, Evans, Farnham, Gowanda, Holland, Marilla, Newstead, North Collins, Orchard Park, Sardinia, Springville and Wales.
	<b>Target Date</b>	3/31/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>23</b>	<b>Project Name</b>	CP25-T. Grand Island - Senior Center Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior Center Improvements CD-2.3
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$101,360.00
	<b>Description</b>	Replacement of approximately 100 feet of old drainage line with approximately 180 feet of 12" corrugated HDPE pipe, 260 feet of 6" corrugated HDPE pipe, several feet of track drain and connections and catch basins.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>24</b>	<b>Project Name</b>	CP25- T. Lancaster - Senior Center Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior Center Improvements CD-2.3
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$155,000.00
	<b>Description</b>	Removal and disposal of current manual partition wall. Installation of electrical infrastructure and the installation of the new election partition wall.
	<b>Target Date</b>	3/31/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
25	<b>Project Name</b>	CP25 - T. Eden - Schwartz Field - ADA Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Building and ADA Improvements CD-2.1
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$53,635.00
	<b>Description</b>	Construction of a 1,500 square foot ADA compliant sidewalk.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
26	<b>Project Name</b>	CP25 - C. Tonawanda - Sidewalk Replacement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Sidewalk Improvements CD-1.2
	<b>Needs Addressed</b>	Infrastructure (Community Development)
	<b>Funding</b>	CDBG: \$155,000.00
	<b>Description</b>	Sidewalk replacement at various locations throughout the low/moderate income block groups in the City of Tonawanda. The project includes replacement of a total of 410 5'x5' blocks of 4-inch thick sidewalk and 49 5'x5' blocks of 6-inch-thick sidewalk at driveways.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	



	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>27</b>	<b>Project Name</b>	CP25- T. West Seneca - Fireman's Park Playground Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Parks/Open Space Facility Improvements CD-2.2
	<b>Needs Addressed</b>	Infrastructure (Community Development)
	<b>Funding</b>	CDBG: \$155,000.00
	<b>Description</b>	Installation of a new, all-inclusive playground.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>28</b>	<b>Project Name</b>	CP25- T. Aurora - Senior Center Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior Center Improvements CD-2.3
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$104,700.00
	<b>Description</b>	Removal and disposal of existing 52 feet long, 11 feet high wall and installation is new motorized wall of equal dimensions.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>29</b>	<b>Project Name</b>	CP25- T. North Collins - Senior Center - Generator Installation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Senior Center Improvements CD-2.3

	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$26,500.00
	<b>Description</b>	Purchase and installation of 18KW generator.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

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

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

Reference should be made to Maps 3, 4, 5 and 6 that are located in ES-05 "Executive Summary" section of the Action Plan in the introduction. These describe the geographic areas within Erie County in which assistance will be directed in 2023. The titles are noted below:

- a) Map 3: CDBG Neighborhood Target Areas within Erie County
- b) Map 4: CDBG Eligible Block Groups
- c) Map 5: CDBG Census Tracts with Substantial Minority Population
- d) Map 6: CDBG Census Tracts with Substantial Low Income Population

It is estimated that 31% of all HOME and CDBG funds will be directed toward the target areas in 2025. This includes 27% of housing rehab monies as well as one economic development project.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City of Lackawanna - First Ward Target Area	19
Village of Depew- Main Street/Terrace Blvd. Target Area	12

**Table 58 - Geographic Distribution**

## **Rationale for the priorities for allocating investments geographically**

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG Consortium.

There is one census tract in the Consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate- income populations within the Consortium. There are a total of 55 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna

First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

## **Discussion**

## Affordable Housing

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

#### Introduction

HOME ARP FUNDS. The Consortium will use HOME funds, ESG funds and a portion of CDBG funds for affordable housing. The HOME and CDBG funds will be used to rehabilitate existing housing units and the ESG funds will be allocated to rental assistance for the homeless and households at risk of homelessness. Low Income Housing Tax Credits will be used for rental housing, both new and rehab of existing units. The special-needs population will be served through the rehabilitation of existing structures for rental housing. Rental assistance will also be available through HUD Section 8 Vouchers which are administered by Belmont Housing Resources of Western New York. It is anticipated that there will be an increase in rental assistance through the ESG grant due to pandemic eviction moratoriums ending at the end of PY 2021.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

**Table 59 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

**Table 60 - One Year Goals for Affordable Housing by Support Type**

## Discussion

Note that the “rental assistance” figure above reflects the annual goal for homeless persons participating in the Rapid Rehousing Prevention and Stabilization Program.

There is a great need for affordable housing in the Consortium communities. The following financial assistance will be available to low-income households in the Consortium:

- Zero interest deferred loans to homeowners to rehabilitate their homes.
- \$5,000 grant to mobile owners to rehabilitate their mobile home.
- Grants to individuals with a disability that need alterations to their structures to make it accessible.

Financial assistance to landlords to rehabilitate rental property for low-income households

The production of new units will include two new single-family homes constructed in the City of Lackawanna for low-income families with the use of HOME CHDO funds.

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

### **Introduction**

There are two public housing authorities within the Erie County Consortium; the Lackawanna Municipal Housing Authority (LMHA) and the Tonawanda Housing Authority (THA). The LMHA operates three federally-funded housing developments in the City of Lackawanna. The developments have a total of 490 units: 396 for families and 94 for senior citizens. There is a total of 264 units within the THA; 211 for families and 42 for senior citizens. It is important to note that the THA is state-funded rather than federally funded.

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

The Lackawanna Municipal Housing Authority (LMHA) has two Educational Resource Centers and a Wellness Center on site. Various programs are offered including Cub Scouts, Girl Scouts, children's holiday parties and educational classes.

In an effort to improve the safety of the Baker Homes and Glover Gardens the LMHA continues to use cameras across from both developments, providing increased security for the residents.

LMHA continues to try and work with different programs to provide service to our residents. For the kids during the winter the LMHA partnered with the YMCA for the "Y On The Fly" program aimed to help youth of all ages to stay active and engaged in mind, body and spirit. The "Y On The Fly" program provided healthy meals, educational enrichment and physical activities, games and more. The LMHA is looking to continue the program throughout the year. The LMHA is also works with other organizations to provide more activities for the children to stay active during the summer months. The LMHA has partnered with the Veggie Van to have fresh vegetables brought in for the residents to pick out. The LMHA works with the Lackawanna Sports Club to also hold a sports program in August for the children of the developments.

1. LMHA continues to address the physical needs of its properties with many updates over recent years. LMHA has put up a 3 bay storage bin to house salt and a new front loader for snow removal. The LMHA has put in new furnaces at the Glover Gardens Development. The LMHA has updated the elevators at the Parkview Towers. The LMHA also continues to paint, install new flooring, update kitchens and update bathrooms in apartments as needed throughout the year.
2. The LMHA installed new ADA compliant playground equipment at Jeffrey Taggart Playground, and will be installing a splash pad this spring.

THA implemented subsidized housing via a NYS award of 125 Project Based Vouchers. THA has remained unsubsidized since it opened in 1942. THA has begun a property rehab that will include a brand new Senior Living Building (54 units) as the first phase of our project. Phase 2 is to rehabilitate all apartments on the property over the next 3-5 years. After the existing Senior Housing Buildings are demolished, THA

is proposing 6-8 wheelchair accessible 2/3 bedroom units in that space. In 2024, 23 buildings in the Colin Kelly project will get new roofs as part of the rehab of those units. For 2024 the goal is to continue to stabilize the buildings while we work toward the gut rehab of all apartments.

THA is in the early stages of a redevelopment project with the intent of rehabbing all units and adding some Senior capacity as well as full ADA compliant units. THA continues our redevelopment process with the support of State, County and City Government and is hopeful for a 2025 start to construction.

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

Within the Lackawanna Municipal Housing Authority (LMHA), the interests of tenants in management are met through three current tenant members who sit on the Authority Board. The Lackawanna Municipal Housing Authority has 3 tenant council boards for each development.

THA has very active Tenant Representatives who schedule community events throughout the year. Board Meetings are held in person and with a virtual link. THA utilizes mailbox flyers for all THA initiatives in an attempt to get our messages out to all. Since 2022, THA also utilizes "text alert" cell phone notifications to all tenants who have subscribed when there are urgent issues on property such as power or water outages, construction on property etc.

Installation of two Food Pantry / Little libraries continue to be managed by the tenants in cooperation with the City of Tonawanda School District. They have a class of kids that 1-2 per week come and stock the pantry with food they have collected. Continue to hold events like Easter Egg Hunt, Fire Safety Day where the fire department brings a fire truck to the property and we do a bicycle registration in conjunction with the Police department, Halloween party. Our website contains links to the School District and City Hall for services needed by residents. Community outreach continues as we have City of Tonawanda officials attending the THA Board Meetings and make themselves available to solve problems and answer questions. THA is working toward a partnership with an internet provided for future construction so that internet is "included" when an apartment is rented.

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

THA is taking steps to address its fiscal viability by implementing PBV's and Section 8 vouchers for the first time in its history. This change significantly improves our ability to maintain the property. Also, as we move into Tax Credit funding programs for construction, this change is vital to the investment community for support to our project conversion. At THA's most recent Audit, it was noted that THA has achieved its fiscal Budget and provided more Operating Revenue than any year in the last 7-10 years. THA will continue to use NYS Grant Money to prepare for reconstruction by ensuring all apartments are in excellent shape prior to rehab in 2026 / 2027. In 2025 THA will add on line applications and rent payment options.



## **Discussion**

LMHA currently has a waitlist of 150-200 people.

Application flow is strong and our vacancy hovers at 95%. Currently there are over 70 applicants on our Wait Lists. In 2024 THA will implement an updated website (currently [www.tonha.org](http://www.tonha.org)) that allows for online applications, online rent payments as we continue to move forward in brick and mortar improvements, support systems are also being addressed to make what we do easier for those needing our services.

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

### **Introduction**

The County, through its Department of Social Services, provides services to individuals and families that are homeless or at risk of becoming homeless. Caseworkers/examiners in the Homeless Unit are dedicated to assisting homeless persons with securing permanent housing as part of the Department's emergency services. The caseworkers assess the individual or family's needs and develop an independent living plan that includes housing and other supportive housing services required by homeless individuals and families to live independently, within the guidelines and requirements of NYS Regulation and Law.

The Department of Environment and Planning provides housing relocation and stabilization services to individuals and families that are homeless or at-risk of becoming homeless. Case managers provide individualized services to facilitate housing stability for program participants who are seeking permanent housing or at-risk of losing permanent housing.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

The District is funded to provide Family Centered Services to families experiencing homelessness in an effort to obtain and maintain permanent housing. It is expected that the team will be in place during the first quarter of 2025 to assist families primarily sheltered at local motels.

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

The Department of Social Services is working with current and potential shelter providers to increase the availability of shelters and improve the services provided. 2025 will be the third year of the required OTDA shelter certifications. The certification requirement has shed light on new and old shelter concerns. Learning from 2023 and 2024, DSS will continue to adjust service provision and staffing to best support our clients.

DSS will continue to offer the Rental Supplement Program to eligible homeless and at -risk of homelessness clients. The program, while limited to clients receiving services will help a total of about 270 households obtain or maintain permanent housing.

CoC homeless outreach teams search for unsheltered persons in Erie County. Erie County provides funding for Code Blue, the local winter shelter. Code Blue staff drive around to make sure people who are on the street or place not meant for human habitation to relocate to code blue shelters. The CoC

also has multiple coordinated entry locations throughout Erie County to ensure access to services for homeless families and individuals.

Erie County Department of Social Services will continue to support programs that help homeless persons, especially unsheltered persons and including the chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The programs include the Emergency Assistance to Adults, Emergency Assistance to Needy Families with Children and Emergency Safety Net Assistance. The programs provide financial assistance for shelter arrears, security agreements, water shutoff restore, heating equipment repair and replacement, home repairs, moving expenses and storage cost for furniture and personal belongings. These services will help homeless persons make the transition to permanent housing and independent living.

The Erie County Department of Mental Health contracts with Endeavor Health Services and Best Self to fund outreach teams that can do street, hospital and shelter outreach for the homeless population which helps them get referred to housing. The teams are also able to provide temporary diagnosis information in order to help clients get the correct level of care in which they need.

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

To address the needs of homeless persons needing emergency shelter and transitional housing the County will continue to provide emergency shelter that serve homeless persons in Erie County. The Erie County Department of Social Services will continue to assist clients through organizations that operate emergency shelters and transitional housing through shelter allowances for the homeless clients. The Department of Social Services contracts with 211 of WNY so individuals seeking emergency shelter have 24-hour access to services. As a result, there are no unsheltered families in Erie County. Emergency Shelters and Transitional Housing programs are using Coordinated Assessment system that the CoC developed to prioritize clients who are most in need and ensure clients are referred to the right program with the right level of care.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The County will continue to use federal funds received under the Emergency Solutions Grant Program for a Rapid Re-housing and Homelessness Prevention Program. The Program prevents individuals and families at risk of becoming homeless from becoming homeless and shortens the shelter stay for homeless individuals and families. The Program provides relocation and stabilization services to individuals and families that are homeless or at risk of becoming homeless. These services help homeless individuals and families make the transition from living in a shelter to permanent affordable

housing. In order to stabilize program participants and prevent program participants from becoming homeless again, program participants are required to work with a case worker while receiving program services.

The Erie County Department of Mental Health prioritizes individuals that are chronically homeless and have a mental health disability for their permanent supportive housing beds. Both the ECDMH and Environment and Planning are using the Coordinated Assessment system that the CoC developed to prioritize clients who are most in need. Once a client is referred to a housing slot bed, they are able to work on goals that help them both assimilate to and achieve the transition from homelessness to more permanent housing lifestyle.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The County works with publicly funded institutions and systems of care such as healthcare facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions to ensure that low-income, especially extremely low-income individuals and families being discharged have housing and services required to avoid homelessness. If discharge services, including housing, are not provided by the publicly funded institutions, the Department of Social Services provides Rental Assistance in the form of Security Agreements and Back Rent payments, to eligible households using County funding. If DSS is not able to assist, the Department of Environment & Planning provides housing relocation, stabilization services and rental assistance to eligible individuals and families in order to prevent the individuals or families from becoming homeless.

The County relies upon Project Blue, an initiative partnering with community providers to reduce Erie County Holding Center recidivism through housing assistance, pre-and post-release support, peer mentoring, cognitive behavioral therapy, and off-site substance abuse and mental health treatment, job training, and education. Service Link Stop is a program through the County's Mental Health Department that provides a central referral location for connecting people leaving Erie County Holding Center with housing services, mental health services, and other wrap-around services. Currently Project Blue and the Service Link Stop remain active programs and are supported in part by Erie County.

## Discussion

The Erie County Department of Mental Health Adult Single Point of Access (SPOA) for Housing has continued to coordinate services with various housing service providers in Western New York. This collaboration facilitates the placement of high need individuals into over 1800 slots of different tiers of mental health residential services including supervised community residences, treatment apartments, single room occupancy facilities, and permanent supportive housing. The Adult SPOA for Housing received 2,226 referrals for housing in 2024, an increase of 12.2% from 2023. This reflects the very high demand for such services in the community.

In order to serve high utilizers of hospital services, the Erie County Department of Mental Health collaborates with the Buffalo Psychiatric Center, Erie County Medical Center, and BryLin to facilitate discharges and system flow. This includes:

- weekly planning and case conferencing with the Buffalo Psychiatric Center and residential providers of every pending discharge to housing in order to help place individuals in the correct level of care and with successful treatment plans.
- Monthly case conferencing with ECMC CPEP to discern how to best serve high utilizers of CPEP
- Bimonthly meetings with care coordination providers in the community to discuss complicated cases
- Ad-hoc technical assistance when requested

The County has created specific resources to facilitate mental health system movement. This includes a set-aside supportive program for people who have been at the Buffalo Psychiatric Center for more than six months (65 beds operated by Spectrum Human Services), as well as 58 additional beds for those leaving BPC residences or for whom leaving a different residential setting would open a spot for someone from BPC (27 beds operated by Spectrum Human Services, 31 by Living Opportunities of DePaul). The County also coordinates services with a New York State Office of Mental Health housing project meant to facilitate the housing of people discharged from ECMC CPEP to facilitate their recovery (19 beds with Spectrum Human Services).

SPOA collaborates with the Continuum of Care Coordinated Entry process to facilitate housing placements of the highest need clients into ECDMH's HUD-funded housing (527 beds) and into other housing, including Empire State Supportive Housing Initiative beds for those with serious mental illness. The SPOA participates in the Continuum of Care's Veteran By-Name list meeting as it has a 40-bed program included in the HUD-funded programs that typically serves higher than capacity.

The Erie County Department of Mental Health leads a county-wide taskforce to create more beds that serve people with substance use disorder, which resulted in the County funding a twelve-bed transitional housing pilot project (operated by Evergreen Health Services, completed in 2024) and information sharing across agencies to facilitate the development of ESSHI programs.

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

### **Introduction**

The County continues to address barriers of providing affordable housing for low and very low-income households in the Consortium communities. An Analysis of Impediments to Fair Housing Choice study was completed in February of 2025. Barriers identified in the study include making housing affordable include public policies, limited resources and access.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Erie County Consortium through the Erie County Department of Environment and Planning will continue to affirmatively further fair housing. In 2022, the County sent out mailings and informational materials about the local Fair Housing Law to local leaders and housing providers as part of the County's continued education and marketing to affirmatively further fair housing. In 2023, Erie County will incorporate barriers noted in the recent (AI) to Fair Housing report, which will be completed in February of 2025 and work with Consortium Municipalities in addressing those barriers and work towards limiting them.

With the goal of strengthening fair housing enforcement activities throughout Erie County, the County will continue to serve on the Erie County Fair Housing Partnership board. In collaboration with the Partnership, Erie County adopted a local fair housing law in 2018.

Erie County DEP will continue to implement its Payment in Lieu of Taxes (PILOT) policy for affordable housing development by reviewing PILOT applications and assisting with the application approval process. PILOT agreements make affordable housing development and management feasible by allowing for a reduced payment, in lieu of paying the full taxes, when the units will be occupied by low and very low-income tenants and will remain affordable throughout the terms of the PILOT agreement.

### **Discussion**

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

### **Introduction**

Contingency Provision – It should be noted that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities indicated below.

a) CDBG Program

(1) Increase:

- Twenty percent of any increase will be applied to planning and administration.
- The balance will be applied to the Unprogrammed community projects listed in the order shown below:

- 1) V. Depew- \$150,000- Sidewalk Replacement
- 2) T. Evans– \$150,000- Wendt Park Improvements
- 3) T. Holland- \$150,000– Water Pump House Improvements
- 4) V. Lancaster- \$150,000- Pleasant Avenue Sewer Improvements
- 5) V. North Collins- \$150,000- Walnut, Kimble, Gurney Waterline Replacement
- 6) T. Orchard Park- \$49,898- Senior Van Purchase

(2) Decrease:

- Twenty percent of any decrease will be applied to the planning and administration project.

The balance of any decrease will be applied to the CD Consortium Housing Rehab Program

- Targeted, Developing, Rural.

b) HOME Investment Partnership

(1) Increase:

- Ten percent of any increase will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.

- The balance will be applied to the HOME Housing Rehab Consortium project or HOME-ARP rental housing.

(2) Decrease:

- Ten percent will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.
- The balance will be applied to the HOME Housing Rehab Consortium project or HOME-ARP rental housing.

(3) Emergency Solutions Grant Program (ESG)

(1) Increase:

- (4) 7.5 percent will be applied to the ESG Administration project.
- (5) The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the increase for each reflecting the same percentage of the overall ESG allocation.

(2) Decrease:

- 7.5 percent will be applied to the ESG Administration project.

The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the decrease for each reflecting the same percentage of the overall ESG allocation.

### **Actions planned to address obstacles to meeting underserved needs**

The 5 year strategic plan clearly notes the need for additional rental housing for low and moderate income households within the Consortium. New in 2021 was the "Live Well Erie" *document* which is a health and human services action plan for Erie County government based on the idea that it is unacceptable for a newly revitalized Western New York to leave behind significant portions of our community when we can effect positive change in their lives.

1. As such, the plan outlines specific measures that Erie County government will undertake to improve the quality of life for residents in need. In 2024 "Live Well Erie" initiatives were implemented that included the creation of new units of affordable housing.
2. An "Analysis of Impediments to Fair Housing Choice" study will be completed in February of 2025. The study serves as the basis for fair housing planning in Erie County.



## **Actions planned to foster and maintain affordable housing**

1. The Erie County Housing Policy and Procedures Manual was updated in the 2024 program year. Key changes will include adjusting the maximum home value amounts for CDBG and HOME housing rehab cases. Updated numbers from HUD for the Erie County SMA area will be utilized.

## **Actions planned to reduce lead-based paint hazards**

### **NYS Lead Based Paint Prevention Program – “Childhood Lead Poisoning Prevention Program ”**

This is a core program funded by the State for identification and mitigation of lead hazards associated with elevated blood lead levels and primary prevention activities to assist families with young children to avoid exposure to lead hazards. This is the second year a 5-year contract which is funded annually for \$1.1 million per year.

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

This involves home environmental inspections, case management with a nurse, and follow-up referral to primary care physicians.

The program also collaborates with local Section 8 Housing providers and other community partners to make proactive inspections and assist property owners in maintaining lead-safe units. The program provides lead safe work practices classes and paint kits to participating owners.

### **Erie County Window Replacement Program**

Erie County received an award of \$350,000 from the New York State Attorney General’s Office for a Window Replacement Program to address energy efficiency and potential lead hazards. The program is available County-wide for homeowners and also for rental properties. Occupants of treated units must be low income. Homeowners may have a required contribution depending on income. Program began in 2024.

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### **LEADSAFE Erie County Lead Hazard Reduction Program**

This program is funded through HUD. The current grant of \$5 million continues through 2024. LeadSAFE’s primary goal is to prevent lead poisoning via improvements to owner-occupied and rental housing. Homeowners must make a contribution towards the cost of mitigating lead-based paint hazards. Although they may have to pay up to a maximum of 12% to the total hazard control cost, in

most instances the cost is \$150-\$250. On average, about 75 units per year are assisted under this program. Although the program is available County-wide, about 75-80% of the grants are made to homeowners within high-risk ZIP code areas. Homeowners and/or tenants must have an income which is below 80% of area median income and have at least one child under age 6 living in the unit.

The County also received a supplemental grant from HUD for \$600,000, which can be used for needed non-LBP hazard mitigation such as a new furnace, moisture control, etc.

#### **“NEW” - Leading in Lead Prevention Pilot Program**

The Erie County Health Department anticipates an award of grant funds in 2024 from NYS Housing Trust Fund Corporation to implement this pilot program. Similar in scope to the HUD Lead Hazard Grant, this program will focus strictly on multiple dwelling (2+ units) rental properties built before 1980 in identified communities of concern. The goal is to target 125 units over two years, a maximum not-to-exceed amount of \$35,000 per unit.

#### **Actions planned to reduce the number of poverty-level families**

As identified in the Initiatives for a Stronger Community and Live Well Erie plans, Erie County will increase financial security and reduce poverty by supporting access to affordable housing. The following actions are being employed to reduce the number of poverty-level families in Erie County:

**LEAD REMEDIATION HOUSING REHAB PROGRAM:** This program was funded in the 2024 PY with 7 cases being completed. The program will continue to be funded in the 2025 PY.

**AFFORDABLE RENTAL HOUSING INCENTIVE PROGRAM:** Approximately \$181,100 in HOME funds will be set aside in 2025. These dollars serve as a source of local matching money and help to leverage millions more. Nonprofit developers will use this money when applying for state and federal affordable housing dollars, making their projects more competitive. Priority will be given to family rental housing.

**ERIE COUNTY FAIR HOUSING LAW:** In 2018 the ECDEP and Department of Law completed a new Countywide Fair Housing Law. The law was passed in May of 2018 and ECDEP is administering the implementation of the law. Housing discrimination due to many factors ranging from lawful source of income to family type are important components of the law. Access to fair housing opportunities is a critical need for families struggling to eliminate all constraints to their financial security.

### **Actions planned to develop institutional structure**

1. The 2025 Program Year will mark the second year of a new 3 year cycle wherein all 37 members of the HOME Consortium have an approved three year renewable agreement with Erie County.
2. The continued reasonableness of the existing percentage allocation formula for distribution of CDBG funds among housing, community revitalization, and economic development will be reviewed as the 2024 program year progresses.
3. In August of 2023 a new 3 year cycle was approved by HUD.
4. In the 2026 Program Year Erie County will re-certify all 34 municipal members of the Consortium for another 3 year period.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Erie County will expand the current CDBG Coordinating Committee to insure better representation by social service agencies. An evaluation of the Housing Working Group formed as part of the One Region Forward initiative will occur. This membership roster will provide a

1. useful resource for additional representation on the coordinating committee from public and private housing groups.
2. Erie County is preparing a comprehensive blueprint for carrying out human service programs. The CDBG grant and resources available through it will be incorporated into the document. This will aid in ongoing coordination between CDBG and DSS activities.

### **Discussion**

## Program Specific Requirements

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

#### Introduction

The CDBG Program will continue to generally utilize the fund distribution policy established by the Consortium in prior years (i.e. 27% Community Revitalization, 27% Housing, and 27% Economic Development). HOME Funds will be used for Homeowner Rehab, new construction of affordable housing and very minimal Homebuyer programs. Emergency Shelter activities will remain focused on rapid rehousing and homeless prevention efforts.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

Erie County will use HOME funds as specified in section 92.205. This primarily includes grants, and non-interest bearing loans. No other forms of HOME investment will be utilized in 2024 Program Year.

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

See attached HOME Recapture Guidelines below (attached).

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

Reference should be made to the HOME fund recapture policy noted in the response to AP90(2) above.

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

HOME funds will not be used to refinance existing loans, thus this Section is not applicable to the Erie County Action Plan.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

**Emergency Solutions Grant (ESG)**  
**Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Buffalo, Niagara Falls, Niagara and Erie County CoC developed and launched a Coordinated Assessment System in 2015, now the Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC. All HUD funded agencies, including CoC and ESG, are using the assessment system. Clients can access Coordinated Entry through coordinated entry hubs, shelters, street outreach teams or community partners, e.g. hospital discharge planner.

The system uses a set of coordinated entry assessment tools (Vulnerability Index and Service

Prioritization Decision Assistance Tool developed by OrdCode) across the entire CoC to triage clients and prioritized those who are most in need. The Homeless Management Information System (HMIS) is used by the CoC to manage coordinated entry priority list.

The coordinated assessment tool is used to determine a potential program participant's eligibility for assistance for Rapid Re-housing (RRH) or Homelessness Prevention (HP). The coordinated assessment tool is available in HMIS, and all ESG program staff has been trained in HMIS and using the coordinated assessment tool or taking referrals through HMIS.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The County allocates ESG funds it receives from HUD through a Request for Proposal (RFP) process. Erie County issued an RFP in August, 2017 for HMIS services and Housing Relocation and Stabilization Services. The ESG RFP was advertised in the legal notices section of a local newspaper and a minority-owned newspaper. Not for profit organizations that provide services to persons that are homeless or at risk of becoming homeless were notified. The RFP included the ESG Program's requirements and an Erie County ESG Proposal Guide. Agencies interested in receiving ESG funds from the County's allocation were invited to an informational meeting that explained the Program requirements and the RFP process. Applications received by the County for ESG funds were reviewed by a committee. One proposal was received for HMIS services and six proposals were received for Housing Relocation and Stabilization Services. The committee considered the following factors when scoring proposals: quality of work with existing nonprofits; expertise; and, expenditure performance. The proposals were ranked and recommendations were made on which agencies to fund.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
5. The County shall accomplish this requirement by working closely with the Subrecipient contracted to provide ESG services. This nonprofit has formerly homeless individuals on staff who will be consulted and will provide input as we update the policies & procedures for the program.
6. Describe performance standards for evaluating ESG.  
The following performance standards for Rapid Rehousing (RRH) and Homeless Prevention (HP) were developed after meeting with Buffalo, Niagara Falls, Erie and Niagara County CoC:
  - 80% exit to permanent housing situation 54% or more of adult participants will have income from sources other than employment 40% or more of adult participants will increase income from sources other than employment 56% or more of all participants have mainstream (non-cash) benefits at exit from program 20% or more of adult participants have employment income 20% or more of adult participants increase employment income less than 30 days from program entry to move into permanent housing. At least 85% of the households that exited a rapid rehousing program to permanent housing should not become homeless again within a year

### HOME- Recapture Guidelines

**Recapture Requirements:** In the event the homeowners transfer ownership of the residence within 5 or less years of the date the homeowner receives the Erie County HOME Assistance, Erie County and the homeowners shall share in the net proceeds from the sale.

#### Definitions:

**HOME Assistance:** HOME funds are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. This includes down payment and closing cost assistance, and second mortgages that finance the difference between fair market value and the homebuyer's first mortgage.

**Homeowner Investment in House:** Homeowner share of required downpayment on the HOME assisted house and any major capital improvements done to the house that are documented by receipts.

**Net Proceeds from Selling the House:** This is sales price minus repayment of any non-HOME loan balance and closing costs financed by the homeowner.

**HOME Recapture:** Amount owed Erie County.

#### Formula:

Example: Mr. and Mrs. Smith purchased a house in February of 2005 using HOME monies through the Erie County First Time Home Buyer Program. The purchase price was \$50,000. Erie County provided a \$6,000 loan toward closing costs and principal reduction on the primary mortgage. The Smiths contributed \$500 toward the required downpayment, \$0 toward closing costs, and obtained a bank mortgage of \$48,000 for the house. The Smiths purchased 4 new windows for \$1,000 and retained receipts for said purchase.

After living in the house for 3 years, the Smiths sold their home for \$55,000. There was 2 years remaining on the County required 5-year affordability period, and a principal balance of \$47,000 on their primary bank mortgage.

The Smiths are required to repay Erie County the net proceeds from the sale as calculated below.

HOME Assistance (\$6,000)	X	Net Proceeds (\$55,000 - \$47,000)	=	HOME Recapture
HOME Assistance (\$6,000) + Homeowner Investment (\$1,000 for windows and \$500 for initial downpayment)		\$6,000 X \$8,000 = Owed to Erie County \$7,500		\$6,400

### HOME Recapture Guidelines



## **ESG- Standards- 1**

### **A. Introduction**

Erie County will continue to provide assistance to individuals and families that are homeless or at risk of becoming homeless through the use of Federal funds received by the County under the Emergency Solutions Grant Program (ESG). The County will continue to provide permanent housing to individuals and families that meet HUD definition of homeless and to very low income families at risk of becoming homeless.

The Program will consist of both the Rapid Re-housing and Homelessness Prevention components of the ESG Program. Housing relocation and stabilization services as well as financial assistance will be available to program participants. The County will contract with not-for-profit agencies that serve the homeless population to implement the Program and oversee the HMIS component of the program.

## **ESG- Standards-2**

### **Evaluation of individuals' and families' eligibility for assistance**

All program participants for the ESG Program must meet HUD definition for homelessness or at risk of homelessness. To determine eligibility for the program all potential program participants will be evaluated by intake staff or case managers using the Continuum Wide coordinated Entry Assessment Tool. The staff will determine the potential program participant's eligibility for assistance, type of assistance. The coordinated entry assessment form is completed within 5 days of intake/case manager at shelter. The Coordinated Entry Lead will then make referral to Rapid Rehousing based on their income, Vulnerability, Homeless history, Domestic violence status, household composition, and program availability.

*The following is the criteria the client must meet in order to be eligible for homelessness prevention and rapid re-housing assistance:*

#### HOMELESSNESS PREVENTION ASSISTANCE

The program participants must provide proof of residency in one of the Erie County CDBG Consortium communities.

Program participants must provide proof of income. Total household income must be below 30 percent of the area median income.

All program participants must meet the following HUD criteria for defining at risk of homelessness for individuals or families, unaccompanied children, youth, or families with children and youths where youths are defined as up to age 25:

Individual or family who will imminently lose their primary nighttime residence, provided that:

- (i) Residence will be lost within 14 days of the date of application for ESG Program:
- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing

Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing

#### RAPID RE-HOUSING ASSISTANCE

The program participants must reside in a homeless shelter or hotel/ motel paid for by Erie County Department of Social Services or other locations that meet HUD definition for homeless. The County will give priority to homeless individuals and families that meet HUD homeless definition and reside in the Erie County CDBG Consortium but, since there are no publicly or privately operated shelters in the Erie

County CDBG Consortium, the County will also recruit program participants from designated homeless shelters in Buffalo, New York.

Individuals or family who lacks a fixed, regular, and adequate nighttime residence,

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelter, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Fleeing/Attempting to flee domestic violence and the individual or family meet the above requirements.

### ESG- Standards-3

#### Coordinating Services

##### Coordination services among other providers

Subrecipient staff participating in the County ESG Program will be required to become familiar with other agencies that provide services under the Buffalo/Erie County Continuum of Care (CoC) and make referrals when necessary. At intake, staff will be required to use the Coe common assessment tool to record program participant's personal data. The common assessment tool information will be recorded in the HMIS database which can be shared with other agencies that are part of the ESG Program. Staff will use the HMIS to refer program participants to other agencies that provide homeless assistance services. Staff will also accept referrals from other agencies that are part of the Coe.

The County will notify other homeless assistance providers of the services that will be available through the Erie County ESG Program. Subrecipient staff will be required to work directly with emergency shelter providers for referral for the Rapid Re-housing component of the Program. Staff will be on site at emergency shelters to interview potential program participants.

##### Mainstream Service and Housing Providers

The County, along with the Homeless Alliance of Western New York and Subrecipients for the County ESG Program, will meet with other mainstream service and housing providers to coordinate and integrate to the maximum extent practicable ESG funded activities. The County does not want to use ESG funds to duplicate activities that are already funded by the County or other agencies. The Subrecipient will be required to use the services of other mainstream service and housing providers when providing assistance to clients.

#### **ESG- Standards-4**

##### **Prioritizing Individuals and Families for Assistance**

Based on the housing needs of the homeless population in Erie County which is documented in the Buffalo/ Erie County Continuum of Care and overseen by the Homeless Alliance of Western New York, the County ESG program will continue to coordinate with the CoC to ensure that the needs of the homeless population in Erie County are met. Erie County's program will continue to prioritize individuals and families who resided in the CDBG consortium prior to entering a shelter. Priority is given to clients that have the longest homeless history and score higher on the Coordinated Entry Assessment.

##### Rapid Re-housing

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining and retaining housing to prioritize individuals and families that will receive assistance under the Rapid Re-housing component of the County ESG Program. Potential participants must meet HUD homeless definition.

##### Homelessness Prevention

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining housing and retaining housing in order to prioritize individuals and families that will receive assistance under the Homelessness Prevention component of the County ESG Program. Potential participants must reside in the Erie County CDBG Consortium and meet HUD homelessness definition, must have an income less than 30% of the area median income, and must have at least 3 other barriers to obtaining housing and at least 3 barriers (other than economic) to retaining housing.

##### Participant Share for Rent and Utilities Costs

Upon entering the program, staff will ensure the rent is reasonable and will immediately start working with the program participant to obtain or confirm a source of income. The Case Manager will work to develop an individualized plan for each program participant to become stably housed. The plan will include a schedule for the participant to pay a portion of their rent and utilities, typically starting at 0%-30% and gradually increasing until the participant is paying the full amount of rent and utilities. Program participants will pay their share directly to the landlord and utility provider. The duration of assistance will depend on the household with a goal of 6 months of assistance and will not exceed 24 months.

#### **ESG- Standards- 5**

##### **Duration of Assistance**

The objective of the County ESG Program is to ensure program participants are stably housed before exiting the Program. Case managers will be required to develop a housing plan for each program participant on entering the Program. The housing plan will be tailored to the participant housing needs, but must address housing search, placement and sustainability. The case managers will review the housing plans monthly with the program participants and update the plans as needed. When it is determined the program participant is stably housed, the case manager will exit the client from the program. No participants will receive assistance for more than 24 months during a three year period.

##### **Housing Stabilization and/or Relocation Services**

As part of the County ESG Program Subrecipient case managers will be required to develop a housing plan for each program participant. The housing plan shall include the type and amount of housing stabilization and/or relocation services program participants will require in order to become stably housed. The services may include financial assistance costs, services costs, mediation, legal services and credit repair.

The services provided to program participants under financial assistance will include short and medium term rental assistance, rental application fees, security deposits, last month rent, utility deposits, utility payments and moving costs. The duration of these services will be determined by the case managers based on the progress the program participant is making to become stably housed. The maximum number of months a program participant may receive financial assistance and/or services is 24 months during a 3 year period.

#### **ESG Standards- 5**

### **Attachments**

## 2025-2029 Five Year Consolidated Plan

### Citizen Participation Appendix

- Citizen Participation Meetings/Hearings
- Erie County Language Assistance Plan
- Community Development Needs Meeting and Survey Responses
- CDBG Stakeholder Forums

Erie County Urban Consortium /  
Town of Hamburg

## Citizen Participation Meetings/ Public Hearings



**CITIZEN PARTICIPATION PROCESS**

**2025-2026**

**ERIE COUNTY CDBG URBAN CONSORTIUM**

<u>SPONSOR</u>	<u>DATE</u>	<u>TIME</u>	<u>LOCATION</u>
ERIE COUNTY-			
CONSORTIUM-WIDE	9/16/2024	7:00 P.M.	TOWN OF HAMBURG
CITIZEN FORUMS:	9/17/2024	7:00 P.M.	VILLAGE OF DEPEW
	9/18/2024	6:30 P. M.	CITY OF LACKAWANNA
	9/19/2024	7:00 P.M.	VILLAGE OF NORTH COLLINS
MUNICIPAL HEARINGS:			
LACKAWANNA, C.	10/21/2024	9:30 A.M	CITY HALL COUNCIL CHAMBERS
TONAWANDA,C.	10/29/2024	5:00 P.M.	COUNCIL CHAMBERS
ALDEN, T.	10/7/2024	7:05 P.M.	TOWN HALL
ALDEN, V.	10/8/2024	6:35 P.M.	VILLAGE HALL
AURORA, T.	10/15/2024	7:00 P.M.	AURORA MUNICIPAL CENTER MEETING ROOM
EAST AURORA, V.	10/7/2024	7:00 P.M.	VILLAGE HALL
BOSTON, T.	10/16/2024	7:30 P.M.	TOWN HALL
BRANT, T.	9/10/2024	7:30 P.M.	TOWN HALL
FARNHAM, V.	8/20/2024	7:30 P.M.	VILLAGE HALL
CLARENCE, T.	11/6/2024	10:15 A. M.	TOWN HALL
COLDEN, T.	10/3/2024	7:00 P.M.	TOWN HALL
COLLINS, T.	10/21/2024	7:30 P.M.	TOWN HALL
GOWANDA, V.	10/8/2024	6:05 P.M.	VILLAGE HALL
CONCORD, T.	10/10/2024	6:15 P.M.	TOWN HALL
SPRINGVILLE, V.	10/7/2024	7:00 P.M.	VILLAGE MUNICIPAL BUILDING
EDEN, T.	10/23/2024	7:15 PM	TOWN HALL
ELMA, T.	9/18/2024	7:00 P.M.	TOWN HALL
EVANS, T.	10/2/2024	7:10 P.M.	TOWN HALL
ANGOLA, V.	10/21/2024	6:10 P.M.	VILLAGE HALL
GRAND ISLAND, T.	10/21/2024	8:00 P.M.	TOWN HALL
HOLLAND, T.	10/9/2024	7:00 P.M.	TOWN HALL
LANCASTER, T.	10/7/2024	7:05 P.M.	TOWN HALL
LANCASTER, V.	10/28/2024	7:15 P.M.	VILLAGE HALL
DEPEW, V.	10/14/2024	7:00 P.M.	VILLAGE HALL
MARILLA, T.	10/22/2024	7:00 P.M.	TOWN HALL
NEWSTEAD, T.	9/23/2024	7:15 P.M.	TOWN HALL
AKRON, V.	10/7/2024	7:00 P.M.	VILLAGE HALL
NORTH COLLINS, T.	9/9/2024	7:30 P.M.	TOWN HALL
NORTH COLLINS, V.	10/15/2024	6:30 P.M.	VILLAGE MUNICIPAL OFFICE
ORCHARD PARK, T.	11/6/2024	7:00 P.M.	MUNICIPAL CTR.-BOARD ROOM
ORCHARD PARK, V.	9/23/2024	7:00 P.M.	MUNICIPAL CTR.
SARDINIA, T.	11/14/2024	6:30 P.M.	TOWN HALL
WALES, T.	9/10/2024	7:00 P.M.	COMMUNITY CENTER
WEST SENECA, T.	10/7/2024	6:00 P.M.	TOWN HALL-COURT
HAMBURG, T.	9/16/2024	7:00 P.M.	TOWN HALL- LOBBY

HAMBURG, T.	9/23/2024	7:00 P.M.	TOWN HALL- LOBBY
HAMBURG, T.	10/7/2024	7:00:00 P.M.	TOWN HALL- LOBBY
HAMBURG, T.	10/19/2024	12:00 P.M.	BLASDELL VILLAGE HALL - LOBBY
COORDINATING COMMITTEE	2/6/2025	10:00 A.M.	1004 RATH BLDG., BUFFALO
CONSOLIDATED	1/21/2025	6:30 P.M.	LACKAWANNA PUBLIC LIBRARY
PLAN ("DRAFT")	1/22/2025	6:30 P.M.	HAMBURG TOWN HALL
PUBLIC HEARINGS	1/23/2025	7:00 P.M.	CITY OF TONAWANDA

CDBG Citizen Participation Meeting Notes  
September 16, 2024 – Town of Hamburg  
September 17, 2024 – Village of Depew  
September 18, 2024 – City of Lackawanna  
September 19, 2024 – Village of North Collins

Public Meeting Notifications:  
Buffalo News – September 6, 2024  
Buffalo Criterion – September 7, 2024  
County of Erie Website – September 6, 2024

CDBG Public Hearings – 2025 Action Plan  
January 21, 2025 – City of Lackawanna  
January 21, 2025 Conference Call – Rath Building  
January 22, 2025 – Town of Hamburg  
January 23, 2025 – City of Tonawanda

Action Plan Meeting Notifications:  
Buffalo News – January 10, 2025  
County of Erie Website – January 10, 2025  
Buffalo Criterion – January 11, 2025

### **1. Housing Needs:**

- a) Questions regarding the County's owner-occupied rehab programs were asked: annual rent increases, income limits, waiting list and what repairs are eligible under the program.
- b) Need for increased funding for housing rehabilitation programs.
- c) Questions regarding the eligibility for the various county affordable housing programs – owner-occupied, handicapped accessibility, and rental rehab.

### **2. Human Service Needs:**

- a) Questions regarding homeless programs available in Erie County to assist the homeless and to prevent homelessness.
- b) Comments about outside senior fitness equipment in Town Park, acoustics of the Senior Center and the need to have the parking lot resurfaced and shelving in the Center.

### **3. Neighborhood / Community Development Needs:**

- a) Questions regarding the eligibility for infrastructure improvement projects such as road paving and drainage improvements.
- b) Questions on when new sidewalks were going in throughout the entire village – said there was a concern for a handicapped person who was having a hard time traversing some of the streets in their wheelchair.
- c) Comments about re-treeing various areas of Lackawanna. Wanted to strongly support the re-treeing efforts within the city, especially along the Riverwalk Trail system that traverses various sections along Rt. 5 within the city.
- d) Resident stated that the Lackawanna Library parking lot needs repaving and the library porch needs to be stabilized.

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#### **4. Economic Development Needs:**

- a) Need for internet access in rural communities.
- b) Need for increased funding for drainage and waterline replacements.
- c) Need for more funding for road paving projects.
- d) Need for increased sidewalk replacement

## Erie County Language Assistance Plan

### Erie County Language Assistance Plan

For those persons with Limited English Proficiency (LEP)

February 10, 2025

#### BACKGROUND DEMOGRAPHIC INFORMATION

The Erie County Community Development Block Grant Consortium ("the Consortium") is comprised of thirty-four municipalities within the County. According to the U.S. Census Bureau (Source: 2022 ACS 5-Year Estimates Table S1601 Language Spoken at Home) Erie County in its entirety, with a total population of 901,223 people age five years and older, has a Limited English Proficiency (LEP) population (those who indicate they speak English "less than very well" according to the Census) of approximately 38,534 people, or 4.3% of the population. The LEP Population of the Consortium is approximately 5,177 people. Of these LEP persons in the Consortium 1,222 speak Spanish; 1,950 speak other Indo-European languages; 479 speak Asian and Pacific Island languages; and 1,526 speak other languages. Figure 1 shows the Census data for the language spoken at home, number of persons who do not speak English "very well," and the percent of same in parenthesis:

Figure 1: Language Spoken at Home in Erie County Consortium

Language Spoken at Home	Persons five years and older in Consortium	LEP Persons five years and older in Consortium (% of entire County's LEP Population)
English	351,151	n/a
Spanish or Spanish Creole	5,226	1,222 (13.5%)
Other Indo-European language	7,871	1,905 (12.7%)
Asian and Pacific Island languages	1,436	479 (5.8%)
Other languages	3,954	1,526 (25.8%)

Source: 2018 – 2022 American Community Survey 5 – Year Estimates

According to the Census, the vast majority of the Erie County Consortium's population speaks English at home. Most residents of the County who speak English as a second language live in communities that are not part of the Consortium. However, it should be noted that more than a quarter of the County's LEP population that speaks Indo-European languages at home are within the Consortium. This category includes many Middle Eastern languages. Particularly within the City of Lackawanna, there may be a significant population that speaks this family of languages, especially a large Yemenite population. Also of interest is that almost one-fifth of LEP households in the "other languages" category are within the Consortium.

## POLICY

Erie County will make every effort to allow persons with Limited English Proficiency the equal opportunity to access all available Community Development Programs being offered throughout the County's CDBG and HOME Consortia.

## PROCEDURES

### *Resources for LEP Persons – Access to Programs*

There are numerous resources available to assist with translation and interpretation services for LEP persons who wish to access Erie County Department of Environment and Planning's (DEP) Community Development programs. Interpretation may be necessary for scenarios including but not limited to application assistance, public meetings, or workshops. Trained staff will use language identification tools to identify the preferred language of the LEP client. Then, if needed, a translation or interpretation service will be used to assist with the oral conversation or understanding of written materials. This allows the LEP person to have full access to the program and its benefit(s) using oral interpretation, written translation, sign language, TTD, or readers.

### *Resources for LEP Persons – Service Providers*

The International Institute of Buffalo (IIB) may be used to provide oral interpretation, should services be needed. The IIB offers interpretation and translation services for any language that would be spoken by Erie County applicants. Another alternative is ACCESS of WNY, which can provide oral or written translation services in Arabic for workshops, client visits and other situations. Deaf Adult Services provides interpretation services and would be used at events or workshops where hard of hearing or deaf persons may need assistance. Many of these types of services require a fee, but once a client is signed up with the agency, the service acquisition is straightforward.

For assistance with language services, DEP intends to issue a Request for Proposal (RFP) no later than June 30, 2014. The RFP will engage a firm or agency for a retainer. Although the RFP will be issued by Erie County DEP, the firm would likely deal with the County's Equal Employment Opportunity (EEO) Office for actual service provision.

### *Resources for LEP Persons – Obtaining Information*

Erie County will designate a staff person to be accessible to LEP residents seeking program information during normal business hours. As necessary, County Community Development staff will make every effort to communicate its program offerings with the aid of interpretation and translation services.

The following are methods to assure that LEP persons obtain information about programs, services, activities, and facilities in the County's Community Development programs:

- Press releases on new and available programs with notice of availability of language assistance, and contact numbers for assistance for LEP persons. Contact numbers can include a specific person within DEP, as well as the County's EEO Office.
- Advertise programs in minority newspapers (including the Front Page/South Buffalo News, which has large Lackawanna readership) with contact number for LEP persons to obtain assistance. The contact numbers would be the same as above.
- Public notice of Fair Housing Rights with contact number for LEP persons. The contact number can be a specific person in DEP, the County's EEO Office, or the outside firm established through the RFP process.
- Publish all projects in minority newspapers with contact numbers for LEP persons. Same contact number(s) as above.
- Hold a public hearing or public meeting so that LEP persons can meet with DEP staff and/or the outside agency, before actually requiring service.

Finally, automated translation programs are available free of charge to anyone with internet access. This allows any citizen to gather information on Community Development news, projects and programs. The technology provided through free computer applications such as Google Translate™ provide the ability to translate various languages through speech or text, which is useful to LEP persons in understanding the County's website, publications, brochures, etc.

#### TRAINING

Upon approval of the LEP plan, County staff will be trained on the policy and procedures identified in this document, as well as how to provide service to people from different cultures. The training will be developed in conjunction with Erie County offices such as Personnel, Department of Social Services, and the EEO Office, and may include consultation with the agency that receives the contract from the RFP. Administration funds from the Community Development Block Grant Program will be used to pay for staff time and any outside agency consultants to assist with training.

#### MONITORING & UPDATING THE LEP

This LEP will be reviewed annually to measure its effectiveness and relevancy to citizens of Erie County. As new U.S. Census data are released, trend monitoring of the LEP population will be performed by Community Development staff, and adjustments to the Plan will be made accordingly.



Municipal Representatives Meeting  
Agenda & Sign In Sheet

Agenda  
Consolidated Plan Community Needs Meeting  
August 22, 2024

- I. Introductions
  - Harrison Studio
  - Municipal Representatives
- II. Consolidated Plan Purpose
- III. Community Needs Survey Responses
- IV. Additional Project Recommendations
- V. Open Discussion
- VI. Next Steps
- VII. Adjournment

# Community Development Needs Meeting

August 22, 2024 @ 2:00 PM

Orchard Park Municipal Building

Municipality	Name/Position	Phone	Email
Village of Collins	Lisa Voss (Trustee)	716-999-9826	Lvoss25@leadrunner.com
Village of Orchard Park	JoAnn Litwin Clinton	716-662-9327	mayer@orchardparkvillage.org
Town of Collins	Kenneth Martin, Supervisor	716-532-4874 ext 103	ken.martin@townofcollins.com
Town of Canaan	Patrick Casicio, Supervisor	716-550-5001	PCasicio@Canaan.NY.US
Town of Lancaster	Robert E. Leary, Supervisor	716-861-1453	rleary@lancastersny.gov
<del>Town of Boston</del>	<del>Town of Boston Supervisor</del>	<del>716-941-6518</del>	<del>SUP@BOSTON.TOWNOFBOSTON.COM</del>
Village of Farnham	Jerethaington / Mayor	716-863-9105	jhfine570@yahoo.com
Town of West Seneca	Gary Dickson / Supervisor	716-558-5203	gdickson@twinsny.org
Town of Holland	Scott Hawk Supervisor	716-537-3191	ghawk@townofhollandny.com
Town of Concord	Philip Doro - Supervisor	716-225-8732	ConcordTownSupervisor@gmail.com

## Community Development Needs Municipal Survey Responses

Community Development Needs Survey Responses  
August 16, 2024

Municipality	Facilities	Services	Planning	Housing	Other	Name/Position
Aurora, Town	1. New folding divider wall for Aurora Senior Center, to enable rom division for more programming. High Priority			1. Need affordable housing for elderly who want to sell large homes and stay in the area. Also, seniors can no longer afford their home and/or property taxes. High priority		Charles Snyder, Supervisor
Clarence, Town	1. Replace Aging roof -Clarence Senior Center-Upgrade to current standards, repair leaks, improve insulation and energy savings. Eliminate ice with melting system. Winter weather creates long icicles that hang low and can cause potential hazards. High Priority. 2. Building Entrance Security System – keyless fob entry for members and staff - Clarence Senior Center. The Center and its members (older adults 55+) are very vulnerable to intruders, who are not an existing member, or employee. The Center is vulnerable active shooter activity, and have little ability to monitor people’s access to the building during business hours. High Priority. 3. Rework entrance access - Clarence Senior Center. Rework the buildings entrance area to allow for the higher clearance for vans and busses, including tour busses. Add handrails and clearance for motorized wheelchairs. This will enhance the ability for people with varying ambulation needs to get dropped off closer to the entrance and covered in inclement weather. Moderate Priority.	1. Indoor and Outdoor Exercise Equipment and park – Clarence Senior Center. Health equipment (indoor) and outdoor park equipment designed for use with people aged 55+, that can support a large variety of people with ambulation needs. Helping further support the ability for older adults to remain healthy and in their homes longer. Moderate Priority.				Jonathan Bleuer, Director, CD, 716-741-8933
Collins, Town	1. Elevator installation and ada bathroom renovation at the L.K. Painter Center, which holds all the town’s senior and youth recreation programs. 2 <sup>nd</sup> floor is not accessibly currently.		1. Develop a Town of Collins Agricultural and Farmland Protection Plan – increasing development pressures from utility solar and wind projects, along with housing	1. Need more owner-occupied – total-house rehabilitation. 2. Financial assistance for elderly with their home repairs	1. Revitalization of businesses in the small commercial districts and hamlets. Businesses are struggling to survive.	Ken Martin, Supervisor

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Community Development Needs Survey Responses  
August 16, 2024

	2. Sidewalk replacement along NYS Route 39 in the hamlet – existing sidewalk is non-contiguous, narrow, broken, etc. 3. Install water pump station for district #4, Armes Court. Village of Gowanda currently supplies water to dist #4, h/e, its on a hill, elevated higher and water pressures don’t meet minimums. 4. More public transportation to Buffalo area to help transport workers, visitors, etc.		developments may remove viable farmland from production.			
Concord, Town	1. Senior Center – rebuild canopy porch roofs to they cover entire doors to provide shelter when people are entering/exiting. High priority	1. RTS Van – continue van service for seniors				Phil Drozd, Supervisor
East Aurora, Village	1. Waterline reconstruction on E. Filmore Ave 2. Road reconstruction on E. Filmore 3. Expand parking lot at East Aurora Fire Dept on Center St 4. Hamlin Park Improvements – could use ada – park playground equipment					Shane Krieger, Village Administrator
Elma, Town	1. Door replacement at Senior Center, as doors do not operate properly. High Priority.	1. Rural Transit Service – transportation for Elm Seniors. High Priority.				Wayne Clark, Supervisor
Farnham, Village	1. Senior Hall – Facility improvements. Use space for emergency shelter for their area. In need of kitchen facilities in the shelter at 526 Commercial Street in an emergency. High Priority.					Jere Hoisington, Mayor
Grand Island	1. Grand Island Blvd-Baseline Road to Long Road. Install new hydrants to help improve fire flow/protection. Medium Priority. 2. Bedell & Baseline Roads – from Town Linear bike path on Bedell to Baseline. New connector path/sidewalk from linear path to Town Center to improve access to Town Center and Sidway School/playground/athletic fields. Low Priority. 3. Grand Island Blvd – North of Fantasy Island to Long Road – Install sidewalks on GI Blvd to	1. Grand Island Senior Center drainage – improve drainage around Center to prevent flooding events. High Priority. 2. Senior Center Transportation – purchase additional vehicles to transport seniors to meet increased need/demand. Medium priority.				Lynn Dingey, Assistant Civil Engineer

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Community Development Needs Survey Responses  
August 16, 2024

	improve access to Town Center and provide access to public transportation. High Priority.					
Holland, Town	1. Water Infrastructure – Water Street Pump house. Requires a complete control panel and power distribution upgrade, w/ all new piping. High Priority 2. Continental Ave – Road and waterline replacement. One of oldest roads in town. High Priority 3. Sidewalks- Vermont Street. Want safer access for residents and kids going to Boys and Girls Club daily. High Priority		1. Code updates and improvements. Town has been having difficulties monitoring and enforcing code violations. Stronger language and reorganizing code to coincide with comprehensive plan			Geoff Hack, Supervisor
Lackawanna	1. Franklin St -Mill and Pave – High Priority 2. Lehigh St – Mill and Pave – High Priority					
Newstead	1. Community Center, 5877 Buell Street – they have outgrown their current senior/community center and have a lease expiring in 2030. Town seeks to replace senior center with a new community center that will service seniors as well as remaining population within the town in one facility. High Priority					Dawn Izydorczak, Supervisor
North Collins, Town	1.Route 62 Main St. Need sidewalks from Village to our town Park. It is unsafe for residents to walk on a street with children. There is no way for residents to get to the park unless they drive. Highest priority 2. Generator for Community Building - We need a warming center for citizens in our area, not just town. 3. Water /sewer to extend down Rt 62 for development purpose. We do not have water and sewer in the town. We need to connect to Village so we can develop housing / and commercial business. 4. Clear Lake reservoir rescue boat We need to get a rescue boat for our volunteer Fire	1.Public transportation - there is no public transportation to and from North Collins-Important for our growth as a community. High priority 2.Childcare service -Families need an after-school program. The town currently subsidizes a program; however, we don't have the revenue to continue. This program allows families to work and pick up their children after. High priority	1.Bicycle Paths - we need safe passage for all the cyclists from other towns that use our scenic roads.	1. In need of 50+ housing – h/e, need water/sewer to be extended for development.		John Tobia, Supervisor

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Community Development Needs Survey Responses  
August 16, 2024

	Departments. Clear Lake is a state reservoir that is not a WMA and open to kayak/ fishing etc.. We have no way to do a water rescue.					
North Collins, Village	1. Replace water lines on Kimble, Walnut, Gurney and Spruce Streets – current lines are extremely old. Water qualify for entire village affected by these deficiencies. 2. Fire protection gear.		1. Feasibility Study for Main St – would help with other grant opportunities to complete the goals set out in their Streetscape Plan		1. Demolition of house on Brant Street- house is condemned but not in foreclosure. 2. Repair or demolish 2098 Sherman Ave. Owner behind on taxes and cannot do the repairs.	Vincent George, Mayor
West Seneca	1. Permanent stormwater pump in Lexington Green neighborhood which is prone to flooding due to ice jams. 2. Two wheelchair vans for WS Senior Center 3. Improvements to Fireman's Park on East and West Road – needs upgraded facilities 4. Improvements to Harlem Road Park – upgrades to facilities					Gary Dickson, Supervisor

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## Stakeholder Invitation List

	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
Planning & Zoning - Municipal Officials (CP & AI)	City of Buffalo	65 Niagara Square, Room 201, Buffalo, NY 14202		Honorable Byron Brown	Mayor	
	City of Lackawanna	714 Ridge Road, Lackawanna, NY 14218		Honorable Annette Iafallo	Mayor	mayor@lackny.com
	City of Tonawanda	200 Niagara Street, Tonawanda, NY 14150		Honorable John White	Mayor	mayor@tonawandacity.com
	Town of Alden	3311 Wende Road, Alden, NY 14004		Honorable Colleen Pautler	Supervisor	colleen.pautler@erie.gov
	Town of Amherst	5583 Main Street, Williamsville, NY 14221		Honorable Brian J. Kulpa	Supervisor	bkulpa@amherst.ny.us
	Town of Aurora	300 Gleed Avenue, East Aurora, NY 14052		Honorable Charles Snyder	Supervisor	
	Town of Boston	8500 Boston State Road, Boston, NY 14025		Honorable Jason A. Keding	Supervisor	supervisorkeding@gmail.com
	Town of Brant	1272 Brant-North Collins Road, Brant, NY 14027		Honorable Mark J. Decarlo	Supervisor	supervisor@brantry.com
	Town of Cheektowaga	3301 Broadway, Cheektowaga, NY 14227		Honorable Brian M. Nowak	Supervisor	bnowak@trocny.org
	Town of Clarence	1 Town Place, Clarence, NY 14031		Honorable Patrick Casillo	Supervisor	pcasillo@clarence.ny.us
	Town of Colden	8812 State Road, P.O. Box 335, Colden, NY 14033		Honorable James P. DePasquale	Supervisor	james.depasquale@townofcolden.com
	Town of Collins	14093 Mill Street, Collins, NY 14034		Honorable Kenneth E. Martin	Supervisor	ken.martin@townofcollins.com
	Town of Concord	86 Franklin Street, P.O. Box 368, Springville, NY 14141		Honorable Philip Drozd	Supervisor	concordtownsupervisor@gmail.com
	Town of Eden	2796 East Church Street, Eden, NY 14057		Honorable Richard Ventry	Supervisor	rventry@edentny.gov
	Town of Elma	1600 Bowen Road, Elma, NY 14059		Honorable Wayne Clark	Supervisor	supervisor@elmanewyork.com
	Town of Evans	8787 Erie Road, Angola, NY 14006		Honorable Raymond J. Ashton	Supervisor	supervisor@townofevans.org
	Town of Grand Island	2255 Baseline Road, Grand Island, NY 14072		Honorable Peter Marston Jr.	Supervisor	pmarston@grand-island.ny.us
	Town of Hamburg	6100 South Park Avenue, Hamburg NY 14075		Honorable Randy Hoak	Supervisor	supervisor@townofhamburgny.gov
	Town of Holland	47 Pearl Street, Holland, NY 14080		Honorable Geoffrey Hack	Supervisor	ghack@townofhollandny.com
	Town of Lancaster	21 Central Avenue, Lancaster, NY 14096		Honorable Robert E. Leary	Supervisor	rleary@lancasterny.gov
	Town of Marilla	1740 Two Rod Road, Marilla, NY 14102		Honorable Earl A. Gingerich Jr.	Supervisor	egingerich@townofmarilla.com
	Town of Newstead	5 Clarence Center Road, P.O. Box 227, Akron, NY 14001		Honorable Dawn D. Izydorczak	Supervisor	dawn@townofnewstead.com
	Town of North Collins	10569 Main Street, P.O. Box 2, North Collins, NY 14111		Honorable John M. Tobia	Supervisor	jtobia@northcollinsny.org
	Town of Orchard Park	4296 S. Buffalo Street, Orchard Park, NY 14127		Honorable Eugene L. Majchrzak	Supervisor	majchrzak@orchardparkny.org
	Town of Sardinia	12320 Savage Road, Sardinia, NY 14134		Honorable Beverly A. Gambino	Supervisor	beverlygambino@outlook.com
	Town of Tonawanda	2919 Delaware Avenue, Kenmore, NY 14217		Honorable Joseph H. Emminger	Supervisor	jemminge@tonawanda.ny.us
	Town of Wales	12345 Big Tree Road, Wales Center, NY 14169		Honorable Tim B. Howard	Supervisor	thoward@townofwales.com
	Town of West Seneca	1250 Union Road, West Seneca, NY 14224		Honorable Gary A. Dickson	Supervisor	gdickson@wsny.org
	Village of Akron	21 Main Street, P.O. Box 180, Akron, NY 14001		Honorable Brian T. Perry	Mayor	akronmayor@akronvillage.us
	Village of Alden	13336 Broadway, Alden, NY 14004		Honorable Loren Prucnal	Mayor	aldenmayor@rochester.ny.com
	Village of Angola	41 Commercial Street, Angola, NY 14006		Honorable Thomas Whelan	Mayor	angolamayor@verizon.net
	Village of Basildel	121 Miriam Avenue, P.O. Box 2180, Basildel, NY 14219		Honorable Rob Hefner Jr.	Mayor	voboffice@aol.com

	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
Public Housing Authority (CP & AI)	Village of Depew	85 Manitou Street, Depew, NY 14043		Honorable Kevin Peterson	Mayor	kpeterson@villageofdepew.org
	Village of East Aurora	571 Main Street, East Aurora, NY 14052		Honorable Peter Mercurio	Mayor	mayor@east-aurora.ny.us
	Village of Farnham	528 Commercial Street, Farnham, NY 14061		Honorable Jere R. Hoisington	Mayor	farnhammayor@roadrunner.com
	Village of Gowanda	27 East Main Street, Gowanda, NY 14070		Honorable David L. Smith	Mayor	gowandamayor@gmail.com
	Village of Hamburg	100 Main Street, Hamburg, NY 14075		Honorable Thomas P. Tallman	Mayor	mayor@villageofhamburg.com
	Village of Kenmore	2919 Delaware Avenue, Kenmore, NY 14217		Honorable Patrick Mang	Mayor	mayor@villageofkenmore.ny.us
	Village of Lancaster	5423 Broadway, Lancaster, NY 14096		Honorable Lynne T. Ruda	Mayor	lruda@lancastervillage.org
	Village of North Collins	10543 Main Street, North Collins, NY 14111		Honorable Vincent D. George	Mayor	VillageClerk@VillageofNorthCollins.org
	Village of Orchard Park	4296 South Buffalo Street, Orchard Park, NY 14127		Honorable Jo Ann Litwin Clinton	Mayor	Mayor@orchardparkvillage.org
	Village of Sloan	425 Reiman Street, Sloan, NY 14127		Honorable Thomas Ferrucci	Mayor	thomas.ferrucci@villageofsloan.org
	Village of Springville	5 West Main Street, Springville, NY 14141		Honorable Timothy Michaels	Mayor	wtmicha@villageofspringvilleny.com
	Village of Williamsville	5585 Main Street, Williamsville, NY 14221		Honorable Christine L. Hunt	Mayor	drogers@village.williamsville.ny.us
CBOs & CHDOs (CP & AI)	Belmont Housing Resources for WNY	1195 Main St, Buffalo, NY 14209	(716) 884-7791 x154	Michael Riegel	President	mriegel@belmonthousingwny.org
	Buffalo Municipal Housing Authority	300 Perry, Buffalo, NY 14204	(716) 855-6711	Gillian Brown	Executive Director	gbrown@bmha.org
	CVR Associates	112 E Post Rd #102 White Plains NY 10601	(813) 223-3100	Michael Tonovitz	Executive Vice President	mtonovitz@crrassociates.com
	Kenmore PHA	657 Colvin Blvd, Kenmore, NY 14217	(716) 874-6000	Steve Stone	Executive Director	
	Lackawanna Housing Authority	135 Odell Street, Lackawanna, NY 14218	(716) 823-2551	Mark Kuwik	Executive Director	kuwik_lmha@gmail.com
	Rental Assistance Corporation	470 Franklin Street, Buffalo, NY 14202	(716) 882-0063 x122	John McMahon	Executive Director	jmc@racnyny.org
	Southern Tier Environments for Living	715 Central Avenue, Buffalo, NY 14048	(716) 366-3200	Steven Aid, Esq.	Director Real Estate Development	saids@stel.org
	Tonawanda Housing Authority	200 Gibson St., Tonawanda, NY 14150	(716) 692-3555	Dale Kikanovich	Executive Director	dkikanovich@tmha.org
	Buffalo Employment And Training Center	77 Goodell St., Buffalo, NY 14203	(716) 856-5627	Divie Farr	Deputy Director	
	Board of Block Clubs	201 City Hall, Buffalo, NY 14202	(716) 851-4841			Bobc@buffalo@gmail.com



	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
	Say Yes	712 Main St., Buffalo, NY 14202	(716) 247-5310 x 217	David Rust	Chief Executive Officer	DRUST@SAYYESBUFFALO.ORG
	Southtowns Rural Preservation	9441 Boston State Road, Boston, NY 14025	(716) 941-5787	Jason Heatley	Executive Director	southtownsrp@aol.com
	St. John Fruitbelt CDC	382 High st, Buffalo, NY 14204	(716) 852-4504	Michael Chapman	President	mchapman@stjohnfruitbelt.org
	University District CDA	3242 Main, Buffalo, NY 14214	(716) 832-1010	Rosann Scibilia	Executive Director	r.scibilia@udcda.org
	VIA Evaluation	628 Washington St. 4th Floor, Buffalo, NY 14203	(716) 362-0627 x 207	Jessica Weitzel	President	Jessica@viaeval.com
Affordable Special Needs Housing (CP & AI)	Neighborworks Community Partners Buffalo	359 Connecticut, Buffalo, NY 14213	(716) 885-2344	Daniel Hawryczak	Local Board President	
	Benedict House of WNY, Inc.	2211 Main St., Buffalo, NY 14214	(716) 834-6940	Diane Bennett	Executive Director	execdir@benedicthouse.org
	Bethesda Community Development Corp.	1365 Main St., Buffalo, NY 14209	(716) 884-3607	Michael Badger	President	pastor@bwhic.com
	Buffalo Federation Of Neighborhood Centers	423 Monroe st, Buffalo, NY 14212	(716) 853-0363	Chandra Redfern	Executive Director	Credfern@bfnc
	CAO of Erie County, Inc.	45 Jewett Avenue, Suite 150, Buffalo, NY 14214	(716) 881-5150	Ulysses O. Wingo, Sr.	Interim President & CEO	
	Cazenovia Recovery Systems	2495 Main Street, Suite 417, Buffalo, NY 14214	(716) 852-4331	Lindsay Hemdon	Chief Executive Officer	
	Citizens Alliance Inc.	836 E. Delavan Ave., Buffalo, NY 14215	(716) 597-0262	Cornelius Johnson	Executive Director	cornelius.johnson@yahoo.com
	DePaul Bridgeway Adult Care Residence	2704 Main St., Buffalo, NY, 14214	(716) 835-9043			
	DePaul Community Services Inc.	1931 Buffalo Rd., Rochester, NY 14624	(585) 426-8000	Gillian Conde	Program Director	gconde@depaul.org
	Erie County Dept of Senior Services	95 Franklin Street, Buffalo, NY 14202	(716) 858-8526	Angela Marinucci	Commissioner	Angela.Marinucci@erie.gov
	Erie County Dept of Social Services	95 Franklin Street, Buffalo, NY 14202	(716) 858-8000	Marie Cannon	Commissioner	Marie.Cannon@erie.gov
	Gateway Longview Inc.	6350 Main St., Williamsville, NY 14221	(716) 783-3100	Carolyn DeFranco	President and CEO	info@gateway-longview.org
	Greater Refuge Temple of Christ	943 Jefferson Ave., Buffalo, NY 14204	(716) 886-2199	Robert L. Sanders	Pastor	rls199@yahoo.com
	Habitat for Humanity-Buffalo	1675 South Park Ave, Buffalo, NY 14220	(716) 204-0740	Rick Folger	Director Strategic Initiatives	rfolger@habitatbuffalo.org
	Hamlin Park Community & Taxpayers Assoc.	60 Hedley Place, Buffalo, NY 14208	(716) 566-6148			hpcabuffalo@gmail.com
	Harvest House	175 Jefferson Avenue, Buffalo, NY 14210	(716) 825-0929	Carol Murphy	CEO	cmurphy@harvesthousebuffalo.org
	Housing Opportunities Made Equal Inc.	1542 Main St. Buffalo, NY 14209	(716) 854-1400	M. Deanna Eason	Executive Director	deason@homeny.org
	Latino Housing Development Corp.	2344 Seneca St., Buffalo, NY 14210	(716) 823-0634			
	Mt. Aaron Community Hope Builders	540 Genesee St. Buffalo, NY 14204	(716) 990-1187	Rev Dwayne Jones	President	djones2524@yahoo.com
	Mt. Olive Community Development Corp.	701 E. Delavan Ave., Buffalo, NY 14215	(716) 895-7494	Dr. William Gillson	Pastor	trufmatferr62@yahoo.com
	New Mt. Ararat Temple of Prayer	971 Jefferson Ave., Buffalo, NY 14204	(716) 885-7755	Bishop Dwight Brown	President	templeofprayer@verizon.net
	NHS of South Buffalo	1937 South Park Ave., Buffalo, NY 14220	(716) 823-3630	Sheryl Dudenwick	Executive Director	Stdudenwick@nhsouthbuffalo.org
	Norstar USA LP	200 South Division St., Buffalo, NY 14204	(716) 847-1098	Linda Goodman	President	goodman@norstar.com
	Temple Community Development Corp.	618 Jefferson Ave., Buffalo, NY 14204	(716) 852-5502	Rev. Matt Brown	President	
	True Community Development Corp.	594 Winslow Ave., Buffalo, NY 14211	(716) 322-1900	Janice McKinzie	Executive Director	janicecmckinzie@truebethel.com
	WNY Independent Living Center	3108 Main Street, Buffalo, NY 14214	(716) 836-0822	Rae Frank	Director	rfrank@wnyli.org
	Best Self! WNY Homeless Coalition	1050 Niagara St., Buffalo, NY 14213	(716) 856-9711 x188	Mark Parker	Homeless Services Programer	mparker@bestselfny.org

	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
Homeless Assistance Providers (CP & AI)	Bessnette House	335 Grider St., Buffalo, NY 14215	(716) 892-8224	Gerry Narice	House Manager	gnarice@peaceprintbwny.org
	Buffalo City Mission	100 E. Tupper St., Buffalo, NY 14203	(716) 854-8181	Aubrey Calhoun	Executive Director	ecalhoun@buffalocitymission.org
	Casa Divita	200 Albany St., Buffalo, NY 14213	(716) 882-8898	Ed Cichon	VP of Advocacy, Communication, and DEI	ecichon@cazenoviarecovery.org
	Child & Family Services Haven House	844 Delaware Ave., Buffalo, NY 14209	(716) 842-2750	Sara Gartland	Director of Violence Prevention and Intervention	sgartland@cfshny.org
	Compass House	1451 Main St., Buffalo, NY 14209	(716) 886-1351	Lisa Freeman	Executive Director	lisafreeman@roadrunner.com
	Endeavor Health Services	1526 Walden Avenue, Suite 400, Cheektowaga NY 14225	(716)895-6700	Elizabeth Mauro	CEO	ELmauro@EHSNY.org
	Family Promise of WNY	16 Glendhu Pl., Buffalo, NY 14210	(716) 821-9100	Luanne Firestone	Executive Director	luanne.firestone@fpwny.org
	Friends of the Night People	394 Hudson Street Buffalo, NY 14201	(716) 884-5375	Joe Heary	Executive Director	joe@friendsofthightpeople.com
	Gerard Place	2515 Bailey Ave., Buffalo, NY 14215	(716) 897-9948	David Zapfel	Executive Director	dzapfel@gerardplace.org
	Homeless Alliance / CoC	960 Main St., Buffalo, NY 14202	(716) 853-1101	Kevin Ma	Executive Director	kevinma@wnyhomeless.org
	Little Portion Friary	1305 Main Street, Buffalo, NY 14209	(716) 882-5705	Elen Wood	Executive Director	
	Matt Urban	243 Sears St	716-863-7222	Ryan Undercoffer	Executive Director	rundercoffer@urbancr.org
	My Place HOME for the Homeless Inc.	1230 Genesee St. Buffalo, NY 14211	(716) 903-2956	Rev. Kent	Pastor/President	rkent2000@yahoo.com
	Restoration Society, Inc.	66 Englewood Ave., Buffalo, NY 14214	(716) 832-2141	Nancy Singh	Chief Executive Officer	nancya97@msn.com
	Salvation Army	960 Main St., Buffalo, NY 14202	(716) 883-9800	Major Lock	Major/President	Annette.Lock@USE.SalvationArmy.org
	Saving Grace Ministries, Inc.	2025 Bailey Ave., Buffalo, NY 14211	(716) 893-1840	Rev. Terry King	Executive Director	terry@sgmworld.org
	St. Adalbert's Response to Love Center	130 Kosciuszko St., Buffalo, NY 14212	(716) 894-7030	Sr. Mary Johnice	Executive Director	sjohnice@aol.com
	Suicide Prevention and Crisis Services, Inc.	2969 Main St., Buffalo, NY 14214	(716) 834-2310	Jessica Piro	Executive Director	jpiro@crisiservices.org
	TRY Program of FLARE, Inc.	228 Brinkman Ave., Buffalo, NY 14211	(716) 892-2814	Sr Mary Augusta Kaiser	President	tryprogram@madrunner.com
	Twin Cities Task Force for the Homeless	46 Broad St., Tonawanda, NY 14150	(716) 957-5099	Karen Carman	Chair	karen.d.carman@gmail.com
	VIVE, Inc.	50 Wyoming Ave., Buffalo, NY 14215	(716) 892-4354	Angela Jordan-Mosley	Executive Director	ed@vivelacasa.org
	WNY Veterans Housing Coalition, Inc.	25 W. Utica St., Buffalo, NY 14209	(716) 882-5935	GiGi Grizanti Cooke	COO	ggrizanti@wnyvhc.org
	WNY Homeless Coalition		(716) 847-0650	Diana Proskie	Chair	dproskie@nls.org
	YWCA of the Niagara Frontier	32 Cottage St., Lockport, NY 14094	(716) 433-6714 x212	Kelly DeMatteo	CEO	kdematteo@ywcarnf.org
	YWCA of Western New York	1005 Grant St., Buffalo, NY 14207	(716) 852-6120	Michelle Sawyers	CEO	MSawyers@wcyw-wny.org
	2-1-1 WNY/Olmstead Center For Sight	1170 Main Street, Buffalo, NY 14209	(716) 882-1025			
	Black Chamber of Commerce	836 E. Delavan, Buffalo, NY 14215	(716) 995-0622			
	Buffalo Erie Niagara Land Improvement Corporation	403 Main Street, Suite 602, Buffalo, NY 14202	(716) 243-3996	Jocelyn Gordon	Executive Director	j.gordon@berlic.org
	Buffalo Niagara Association of Realtors	200 John James Audubon Pkwy, Suite 201, Bflo, NY 14228	(716) 636-9000	Vienna Laurendi	President	president@bmar.org
	Buffalo Niagara Partnership	257 West Genesee St, Suite 600, Buffalo, NY 14202	(716) 852-7100	Dotie Gallagher	President/CEO	dgo@thepartnership.org
	Buffalo Urban Development Corporation	95 Perry St #404, Buffalo, NY 14203	(716) 856-6525 x130	Brandye Merriweather	President	brmerriweather@buffalourbandevelopment.com

	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
Regional Agencies (CP & AI)	Cheektowaga Chamber of Commerce	2875 Union Road, Cheektowaga, NY 14227	(716) 684-5838	Kristina Groff	President/CEO	groff@cheektowaga.org
	Consumer Credit Counseling Service of Buffalo (Parachute)	40 Gardenville Pkwy, West Seneca, NY 14224	(716) 712-2060	Lisa Robertson	Manager of Counseling Svcs	
	Empire State Development Corp	95 Perry Street, Suite 500, Buffalo, NY 14203	(716) 846-8200	Karen Utz	Regional Director	wry@esd.ny.gov
	GBNRTC	438 Main Street, Suite 503 Buffalo, NY 14202	(716) 856-2026			staff@gbnrtc.org
	Local Initiatives Support Corporation (LISC)	PO Box 423, Buffalo, NY 14212	(716) 852-3430	Valerie White	Senior Executive Director	vwhite@lisc.org
	NFTA	181 Ellicott Street, Buffalo, NY 14203	(716) 855-7300	Kimberly Minkel	CEO	
	NYS DOT	100 Seneca Street, Buffalo, NY 14203	(716) 847-3238	Francis Cirillo	Regional Director	
	One Region Forward/UB Regional Institute	77 Goodell Street, Buffalo, NY 14222	(716) 878-2433	Bart Roberts	Interim Director	regional-institute@buffalo.edu
	Rural Transit Service	1000 Brant-Farnham Road, PO Box 212, Brant, NY 14027	(716) 549-5098	Suni Stachura	Executive Director	Staff@RuralTransitService.org
	Small Business Development Center	1300 Elmwood ave., Buffalo, NY 14222	(716) 878-4030	Dr. Susan McCartney	Director	smccartsa@buffalostate.edu
	Workforce Investment Board	726 Exchange St., Suite 632, Buffalo, NY 14210	(716) 504-1480	Jacqueline Hall	Executive Director	
	African Cultural Center of Buffalo, Inc.	350 Masten Ave., Buffalo, NY 14209	(716) 884-2013	Leah Angel Daniel	Executive Director	
	AIDS Community Services of WNY	206 S. Elmwood Ave., Buffalo, NY 14201	(716) 847-0212			
	AIDS Family Services	1062 Main St., Buffalo, NY 14209	(716) 881-4612			
	Amherst Center for Senior Services	370 Audubon Pkwy, Amherst, NY 14228	(716) 636-3050			
	American Red Cross Buffalo NY	786 Delaware Ave., Buffalo, NY 14209	(716) 886-7500			
	Back To Basics Outreach Ministries, Inc.	971 Jefferson Avenue, Buffalo, NY 14204	(716) 854-1086	Pastor James E. Giles	President/CEO	gjiles274@gmail.com
	Best Self Behavioral Health	255 Delaware Avenue, Buffalo, NY 14202	(716) 856-9711 x 187			info@bestselfwny.org
	Big Brothers/Big Sisters	100 River Rock Drive., Buffalo, NY 14207	(716) 873-5833	Emily Mahoney	CEO	Emily.Mahoney@bbbsenst.org
	Boys & Girls Clubs of Buffalo	282 Babcock St., Buffalo, NY 14210	(716) 884-4964			info@bgcbuffalo.org
	Boys & Girls Clubs of the Northtowns	34 Riverdale Ave., Buffalo, NY 14207	(716) 873-9842	Bob O'Brocta	CEO	robocota@bgcmt.net
	Buffalo Center for Arts and Technology	1221 Main Street, Buffalo, NY	(716) 259-1680	Gina Burkhardt	President and CEO	
	Catholic Charities	741 Delaware Ave., Buffalo, NY 14209	(716) 218-1400			
	Catholic Health System	144 Genesee Street, Buffalo, NY 14203	(716) 706-2112			
	Center for Employment Opportunities	170 Franklin St. 7th Fl., Buffalo, NY 14202	(716) 842-6320			ceo@buffalo@ceoworks.org
	Cheektowaga Senior Services	3349 Broadway, Cheektowaga, NY 14227	(716) 686-3930			
	Cheektowaga Youth and Recreation	275 Alexander Ave, Buffalo, NY 14211	(716) 897-7207			
	Child & Family Services	330 Delaware Ave., Buffalo, NY 14202	(716) 842-2750	Elizabeth McParland	President/CEO	
	Compeer	1179 Kenmore Avenue, Buffalo, NY 14217	(716) 883-3331	Cheri Alvarez	CEO	
	Concerned Ecumenical Ministry	286 Lafayette Ave., Buffalo, NY 14213	(716) 984-2442			
	CRUCIAL Human Services, Inc.	230 Moselle St., Buffalo, NY 14211	(716) 895-8891			
	Erie Regional Housing Development Corp	104 Maryland St., Buffalo, NY 14201	(716) 845-0485			

	Name of Organization	Mailing Address	Telephone	Contact Name	Title	Email Address
Health & Human Service Agencies (CP)	Erie County Office for the Disabled	95 Franklin Street, Buffalo, NY 14202	(716) 858-6215	Frank Cammarata, III	Executive Director	frank.cammarata@erie.gov
	Evergreen Health	206 S Elmwood Ave, Buffalo, NY 14201	(716) 847-0212			
	Family Justice Center	438 Main Street, Buffalo NY 14202 Suite 201	(716) 558-7233	Mary Murphy	Executive Director	mmurphy@fjcsafo.org
	Friends to the Elderly	118 E. Ulica St., Buffalo, NY 14209	(716) 882-0602			
	Group Ministries	1333 Jefferson Ave., Buffalo, NY 14208	(716) 883-4367			
	Hispanics United of Buffalo	254 Virginia St., Buffalo, NY 14201	(716) 856-7110			
	Jewish Community Center/Jewish Community Federation	338 Harris Hill Road, Suite 1088, Williamsville, NY 14221	(716) 463-5050			info@buffalojewishfederation.org
	King Urban Life Center	938 Genesee St., Buffalo, NY 14211	(716) 891-7912			
	Literacy Volunteers of Buffalo and Erie County, Inc.	1 Lafayette Square, Buffalo, NY 14203	(716) 876-8991			
	Los Tainos Senior Citizens Center, Inc.	333 Trenton Ave., Buffalo, NY 14201	(716) 842-0172			
	Love, Inc.	62 E. Main Street, Springville, NY 14141	(716) 592-3761			
	Lutheran Service Society	6680 Main Street, Williamsville, NY 14221	(716) 631-9212			
	Massachusetts Avenue Project	387 Massachusetts Ave, Buffalo, NY 14213	(716) 882-5327			
	Meals on Wheels	100 James E. Casey Dr., Buffalo, NY 14206	(716) 822-2002	Tara A. Ellis	Chief Executive Officer	telis@mealsonwheelswny.org
	Metro Community Development Corp - Senior	877 E. Delavan Ave., Buffalo, NY 14215	(716) 896-7021	Candace Moppins	Executive Director	metrock877@yahoo.com
	New Life Residential Center	24 Memorial Dr., Buffalo, NY 14240				
	North Buffalo Community Development Corp	203 Sanders Rd., Buffalo, NY 14216	(716) 874-6133			
	Northwest Buffalo Community Center, Inc.	155 Lawn Ave., Buffalo, NY 14207	(716) 876-8108			
	Olmsted Center for Sight/Visually Impaired Advancement	1170 Main Street, Buffalo, NY 14209	(716) 882-1025	Tammy Owen	President/CEO	
	Peace of the City Ministries	370 Normal Avenue, Buffalo, NY 14213	(716) 996-0970	Diann Takens	Founder/Executive Director	dtakens@peaceofthecity.org
	Police Athletic League of Buffalo	65 Niagara Sq., 21st Floor, Buffalo, NY 14202	(716) 851-4615			
	Resource Council of WNY	347 East Ferry Street Buffalo, New York 14208	(716)-783-8329	Catherine M. Roberts	President and CEO	
	Read to Succeed	392 Pearl St., Buffalo, NY 14202	(716) 843-8895	Anne Ryan	Executive Director	RyanA@rnsb.org
	Seneca-Babcock Community Assoc., Inc.	1168 Seneca St., Buffalo, NY 14210	(716) 822-5094			
	Seneca Street CDC	1218 Seneca Street, Buffalo, NY 14210	(716) 939-3501	Cheryl Bird	President	cbird@senecastreetcdc.org
	Shiloh Youth Foundation	15 Pine St., Buffalo, NY 14204	(716) 856-2660			
	South Buffalo Community Assoc	35 Cazenovia St., Buffalo, NY 14220	(716) 822-4532	Michael Weidrich	Executive Director	
	The Arc Erie County	30 Wilson Road, Williamsville, NY 14221	(833) 272-3743	Douglas DiGesano	CEO	intake@arcoreriecounty.org
	Trinity Baptist Church	2506 Bailey Ave., Buffalo, NY 14215	(716) 835-5955			
	United Way of Buffalo & Erie County	742 Delaware Ave., Buffalo, NY 14209	(716) 887-2826			
	Urban Christian Ministries	967 Jefferson Ave., Buffalo, NY 14204	(716) 882-9472	Rev. Denise Walden Gienn	CEO	
	Valley Community Assoc., Inc.	93 Leddy St., Buffalo, NY 14210	(716) 823-4707	Denise Pkuzinski	Executive Director	info@thevalleycenter.com

	<i>Name of Organization</i>	<i>Mailing Address</i>	<i>Telephone</i>	<i>Contact Name</i>	<i>Title</i>	<i>Email Address</i>
	West Side Community Services	161 Vermont St., Buffalo, NY 14213	(716) 884-6616	Crystal Selk	Executive Director	info@wscsbuffalo.org
	Westminster Economic Development Initiative	436 Grant St., Buffalo, NY 14202	(716) 393-4088	Carolyn Welch	Executive Director	cwelch@wedibuffalo.org
	William Emslie YMCA	585 William St., Buffalo, NY 14206	(716) 845-5440			
<b>Lead Based Paint (CP)</b>	Community Foundation for Greater Buffalo	726 Exchange St., Suite 525, Buffalo, NY 14210	(716) 852-2857	Betsy Constantine-	President/CEO	stephaniek@cfbg.org
	Erie County Health Dept.	462 Grider St., Buffalo, NY 14215	(716) 961-6800	Melanie Desiderio	Project Director	Melanie.Desiderio@erie.gov
<b>Business Associations (CP)</b>	Allentown Association	61 College Street, Buffalo, NY	(716) 881-1024	Patty Macdonald	President	contact@allentown.org
	Exchange Street Business Association	77 Lee, Depew, NY 14243	(716) 681-2753	Derrick Parson	Executive Director	info@theexchangebuffalo.org
	Elmwood Village Association	875 Elmwood, Buffalo, NY 14222	(716) 881-0707			info@elmwoodvillage.org
	Hertel Business Association	1599 Hertel Avenue, Buffalo, NY 14216				info@hertel-ave.com
	Ken-Ton Chamber of Commerce	3411 Delaware Ave., Kenmore, NY 14217	(716) 674-1202	Cathy Pickulo	President & CEO	cathy@ken-ton.org
	Latino Business Association	555 Niagara Street, Buffalo, NY 14201	(716) 572-2207			
	Parkside Community Association	2318 Main, Buffalo, NY 14214	(716) 838-1240	Pat Miller	President	admin@parksidebuffalo.org
	Southtowns Regional Chamber of Commerce	6122 South Park Ave., Hamburg, NY 14075	(716) 649-7917	Jamie Decker	Executive Director	jamie@southtownsregionalchamber.org
	South Buffalo Chamber of Commerce	2189 Seneca Street, Buffalo, NY 14210	(716) 824-9942			southbuffalochamber@gmail.com
	Westside Business & Taxpayers Association	Grant Street, Buffalo, NY	(716) 885-0719			
<b>Advocacy Orgs. for Persons with Disabilities (AI)</b>	Community Services for Every1	180 Oak Street, Buffalo, NY 14203	(716) 883-8888	Mindy Cervoni	President and CEO	
	Erie County Dept. of Mental Health	95 Franklin St., 12th Floor, Buffalo, NY 14202	(716) 856-6498	Mark O'Brien	Commissioner	Mark.O'Brien@erie.gov
	Erie County Office for the Disabled	95 Franklin St., 6th Floor, Buffalo, NY 14202	(716) 856-6215	Frank Cammarata	Executive Director	frank.cammarata@erie.gov
	Heritage Centers	101 Oak, Buffalo, NY 14203	(716) 856-4201			info@heritagecenters.org
	Learning Disabilities Association of WNY	2555 Elmwood Ave., Kenmore, NY 14207	(716) 874-7200	Marc Hennig	Deputy Executive Officer	Mhennig@lidaofwny.org
	Visually Impaired Advancement (VIA)	1170 Main Street, Buffalo, NY 14209	(716) 882-1025	Michael Hill	President & CEO	mhill@viawny.org
	Office for Persons With Developmental Disabilities (OPWDD)	1200 East & West Rd. West Seneca, NY 14224	(716) 517-2000	David Viggiani		
	People Inc.	1219 No. Forest Rd., Amherst, NY 14221	(716) 634-8132	Anne McCaffrey	President/CEO	amccaffrey@people-inc.org
<b>Advocacy Orgs. for Persons with LEP (AI)</b>	Catholic Charities	741 Delaware Ave., Buffalo, NY 14209	(716) 218-1400	Dennis Walczyk	Chief Executive Officer	dc.walczyk@ccwny.org
	International Institute	864 Delaware Ave., Buffalo, NY 14209	(716) 883-1900	Jennifer Rizzo-Choi	Executive Director	jizzo@iibuff.org
	Jewish Family Services	70 Barker St., Buffalo, NY 14209	(716) 883-1914	Molly Carr	President	mcarr@jfswny.org
	Journey's End Refugee Resettlement	2496 Main, Suite 317, Buffalo, NY 14214	(716) 882-4963	Pamela Bos Keli	Executive Director	pkeli@jensbuffalo.org
	Sudanese Friends Int'l for Coord. Support Agency	607 City Hall, Buffalo, NY 14202		William Dei	President	
<b>Fair Housing Orgs. (AI)</b>	Buffalo Urban League	15 Genesee St., Buffalo, NY 14203	(716) 250-2415	Thomas Beauford, Jr.	Executive Director	tbeauford@bunly.org
	Center for Elder Law & Justice	438 Main Street, Suite 1200, Buffalo, NY 14202	(716) 853-3087 x209	Karen Nicolson	CEO	knicolson@elderlawjustice.org
	Housing Opportunities Made Equal	1542 Main St., Buffalo, NY 14209	(716) 854-1400	Deana Eason	Executive Director	deason@homeiny.org
	Legal Aid Bureau of Buffalo	237 Main St., Suite 1602, Buffalo, NY 14203	(716) 853-9555	David C. Schopp	Executive Attorney	dschopp@legalaidbuffalo.org

	<i>Name of Organization</i>	<i>Mailing Address</i>	<i>Telephone</i>	<i>Contact Name</i>	<i>Title</i>	<i>Email Address</i>
	Neighborhood Legal Services	237 Main St., Suite 400, Buffalo, NY 14203	(716) 847-0655	Lauren Breen	Executive Director	lbreen@nls.org
	WNY Law Center	37 Franklin st., Buffalo, NY 14202	(716) 855-0203 x101	Karen Welch	Executive Director	KWelch@WNYLC.Net
<b>Non-profit Owners (AI)</b>	Aspire of WNY	2396 N Forest Rd, Getzville, NY 14068				
	Belmont Housing Resources for WNY	1195 Main St, Buffalo, NY 14209	(716) 884-7791 x154	Michael Riegel	President	mriegel@belmonthousingwny.org
	Community Services for Every1	180 Oak Street, Buffalo, NY 14203	(716) 883-8888	Mindy Cervoni	President and CEO	
	Delta Development of Western New York	525 Washington Street, Buffalo NY 14203	(716) 847-1635	James Lonergan	Executive Director	jlonergan@ccwny.org
	Depaul	1931 Buffalo Rd., Rochester, NY 14624	(585) 426-8000	Gillian Conde	Program Director	gconde@depaul.org
	VIA	1170 Main Street, Buffalo, NY 14209	(716) 882-1025	Michael Hill	President & CEO	mhill@viawny.org
	People Inc. Community Housing Development Org.	1219 North Forest Road, Williamsville NY 14231	(716) 817-7426	Rhonda Frederick		rfrederick@people-inc.org
<b>For-profit owners (AI)</b>	Ciminetti	50 Fountain Plaza Buffalo NY 14202	(716) 631-8000	Christopher Keenan	SVP Property Management	
	Clover Construction Management, Inc.	348 Harris Hill Road, Williamsville NY 14221	(716) 677-4141	Richard Greenspan		info@clovergroupinc.com
	Douglas Development	855 New York Ave., NW, Suite 830, Washington, DC, 20001		Paul Milstein		pmilstein@douglasdev.com
	Elliott	295 Main St Buffalo NY 14203	(716) 854-0060	William Paladino	CEO	bpaladino@elliottdevelopment.com
	MJ Peterson	200 Audubon Pkwy Amherst NY 14228	(716) 688-1234	Tamara Fowlston	Director of Affordable Housing	tfowlston@mjpeterson.com
	Sinatra	617 Main St Buffalo NY 14203	(716) 220-8468	Nick Sinatra	President	nick@sinatraandcompany.com
	Top Enterprises Inc.	P.O. Box 693, Buffalo, NY 14215	716.777.4541			topenterprisesinc@yahoo.com
<b>Property Managers (AI)</b>	WinnCompanies	1 Washington Mall, Suite 500, Boston MA 02108	(617) 742-4500	David Ginsberg		dginsberg@WINNCO.com
<b>Broadband</b>	Belmont Housing Resources for WNY	2393 Main Street, Buffalo NY 14214	(716) 884-7791 x154	Michael Riegel	President	mriegel@belmonthousingwny.org
	ErieNet LDC	1 Seneca Street, 29th Floor, Buffalo, NY 14203	(716) 221-4598	Melissa Hartman	Executive Director	ghouppert@ecclec.com
<b>Resilience &amp; Emergency Mgmt Agencies</b>	Buffalo Niagara Waterkeeper	721 Main Street, Buffalo, NY 14203	(716) 852-7483	Jill Spisiak Jedlicka	Executive Director	jedlicka@bnwaterkeeper.org
	Sierra Club Niagara Group	PO Box 1127, Williamsville, NY 14231				niagarasierra@gmail.com
	WNY Land Conservancy	PO Box 571, E. Aurora, NY 14052	(716) 687-1225 x. 128	Josh Balister-Stewardship Director	Stewardship Director	josh@wnylc.org
	Clean Air Coalition of WNY	371 Delaware Avenue, Buffalo, NY 14202	(716) 852-3813	Chris Murawski-Executive Director	Executive Director	Chris@caowny.org
	Buffalo Niagara Waterkeeper	721 Main Street, Buffalo, NY 14203	716.852.7483, ext. 21	Jill Jedlicka-Executive Director	Executive Director	jedlicka@bnwaterkeeper.org
	Western New York Environmental Alliance	726 Exchange Street, Suite 525, Buffalo, NY 14210	(716) 852-2857	Betsy Constantine-President/CEO	President/CEO	mali@cfbg.org

## Stakeholder Meetings Notes

- Regional Agencies and Economic Development
- Homelessness and Individuals with Special Needs
- Community Based Development Organizations and  
Community Housing Development Organizations
- Health and Human Services
- Housing: Property Owners and Managers
- Advocacy and Fair Housing
- Resilience and Emergency Management

**Group #1 Regional Agencies and Economic Development**

**Time:** 10AM

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Federal Entitlement Dollars*
  - a. Types of Funds: Community Block Grants (CDBG); Housing Opportunities Made Equal (HOME); Housing Opportunities for Persons with AIDS (HOPWA); Emergency Solutions Grants (ESG); and CDBG-CV (During COVID).
  - b. Allocation: Each municipality determines how funds are allocated and spent within low-moderate-income communities.
2. *Economic Development Projects*
  - a. Past Projects: Focus on reinvesting in communities and neighborhoods, public infrastructure, parks, and historic properties.
  - b. Challenges: Job creation component is a struggle.
3. *Slum & Blight*
  - a. Projects: Historic properties like the Village of Williamsville Meeting House and the section house on the rail trail.
  - b. Usage: Properties are shored up for public use.
4. *Job Creation & Economic Development*
  - a. Micro Enterprise Programs: Small grants available to small businesses for job creation.
  - b. Challenges: Monitoring job creation and ensuring fair and equitable processes.
5. *Infrastructure Needs*
  - a. Examples: Sewer lining, road repaving, sidewalks, and parks.
  - b. Municipal Examples: Lackawanna, Hamburg, and Evans have undertaken significant infrastructure projects.
  - c. Lack of internet access in rural areas.
6. *Transportation*
  - a. Issues: Lack of public transportation in rural areas, need for better job access.
  - b. **\*\*Solutions\*\***: Transit-oriented development, building housing around existing transit lines, and creating walkable communities.
7. *Housing*
  - a. Challenges: High costs of building new homes, lack of private sector interest in starter homes.
  - b. **\*\*Solutions\*\***: State subsidies, leveraging existing infrastructure projects, and partnerships with developers.
8. *Partnerships*
  - a. Examples include Lackawanna's partnership with developers to revitalize Main Street and the City of Buffalo's Adams Street project.

- b. Importance: Public-private partnerships are crucial for large-scale projects.
- c. Use existing projects to help tackle current infrastructure needs. Example: The Shoreline Trail in Evans.

#### **Key Takeaways:**

1. **Follow-up Meetings:** Ensure contact info is shared for further talks.
2. **Outreach:** Reach out to other banks and developers for potential partnerships.
3. **Engagement:** Continue community engagement to educate and involve residents in planning processes.
4. **Data Collection:** Gather more data on housing supply and demand, particularly for starter homes.
5. **Infrastructure:** Infrastructure in municipalities is aging and in need of updates. Along with transportation updates.

#### **Detailed Meeting Notes:**

- Planning period for Consolidated Plan is **2025-2029**
- Question: What projects have you seen with federal dollars spent on low-moderate income communities?
  - Town of Amherst Community Development is focusing on infrastructure projects, they have spent CDBG dollars on clearing sum and blight, they have spent money on parks and recreation as well as sewer lines. Amherst struggles with job creation (it can be hard to connect how funds are being used on low-moderate income communities w/ economic development projects) and gets very little CDBG funds.
  - City of Buffalo – CDBG-CV (During COVID) they had a program not for the creation of jobs, but the retention of jobs.
- Question: What are the infrastructure needs in the municipalities?
  - City of Lackawanna is trying to revitalize their neighborhoods but the infrastructure can't support that. They recently just dug up the streets and redid all of the infrastructure in a certain portion of the city. They redid sidewalks, repaved roads, put in a park.
  - Village of Hamburg water systems breaking/flooding.
  - Biking infrastructure Lackawanna -> south
  - Transportation/internet is always an issue in rural communities.
  - Town of Hamburg needs to focus on improving their transportation, its nearly nonexistent. (**Reach out to Chris Hull** (director of community development in Hamburg) he is a champion for affordable housing)
  - Town of Evans was looking for more healthcare centers.
  - GNRBTC – Focusing on work access, getting people to where their jobs are. Creating more complete streets (walkable communities)
- Question: How do the municipalities triage projects?
  - In the Town of Evans, they base it off of another project. For example, when they wanted to complete the shoreline trail, they knew infrastructure needed to be

updated. They don't know there is a problem until there is a project that forces them to look into it.

- Town of Cheektowaga, works closely with their engineering department, they know what needs to be done.
- City of Buffalo, engineering keeps a database on the conditions in the City and they use this system to help determine the needs. They also do target where other investments are occurring.
- Infrastructure is a difficult list to tackle, you make a priority list and try your best to be strategic.
- Town of Amherst, they try to highlight the goals and priorities based upon each entity. What are the overall goals of the 5yr consolidated plan?
- COB & County Land Bank, they focus on utilizing vacant land to build new development, such as housing. Starter homes are very much having a supply issue, no private developer wants to build a starter home because it does not work financially.
- Funds need to be available to rehab zombie properties, there needs to be a way to rehab them and put them on the market. Succession issue w/ zombie properties.
- Supply vs. demand issue with the housing market, are federal funds being used in the right way to support housing?
- Town of Cheektowaga has to work with the land bank to acquire vacant lots.
- The modular homes being build in Lackawanna was brought up.
- NFTA struggles with serving new housing complexes, just because housing is built does not mean they can service the area. We need to build housing on existing transit corridors.
- Question: How do we create an ecosystem, an opportunity where we can partner/leverage to meet the needs?
  - **Partnerships w/ public and private entities.**
    - City of Lackawanna: Ridge Rd, needs serious investment, buildings are dilapidated, they are working with a private developer to redo a corner on that street. Bethlehem Steel land being redeveloped.
    - City of Buffalo: Adams St project. COB looks to leverage where the department of public works is already working.
  - Work with banks, such as Evans bank
  - Reach out to Sean Ryan's office
  - Partner with the Buffalo-Niagara Builders Assoc.
  - Partner w/ Minority Developers

**Group #2 Homelessness & Special Needs Housing**

6/25/24

**Time:** 1PM

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Housing*
  - a. Need more transitional housing: Longer lengths of stays for people in emergency shelters.
  - b. Shelters are at capacity.
  - c. Need more subsidized housing.
  - d. Rent is too high/ cost of housing is too high.
  - e. Need more safe housing for DV victims.
  - f. Be creative about how to add more housing units. (Tiny homes example)
2. *Challenges with Services*
  - a. "Streamlining of services" has cut out an entire demographic.
  - b. Need for supportive services once people are placed into housing so that they remain in that housing.
  - c. Services in life skills are needed for people living in shelters.
  - d. Language services needed.
3. *Regulatory Concerns/Zoning*
  - a. NYS has too many rules and regulations that prevent creative solutions for affordable housing from being translated here. (Tiny homes in Texas example)
  - b. Regulations (zoning) prevents the construction of new shelters.
  - c. Buffalo is very segregated

**Key Takeaways:**

1. **Address affordable housing.**
2. **Add more capacity for shelters/transitional housing.**
3. **Strengthen supportive services provided to people living in shelters/transitional/affordable housing.**
4. **Address regulatory issues that prevent shelters/affordable housing from being built.**

**Detailed Meeting Notes:**

- How has the pandemic impacted your organizations since 2020?
  - Buffalo City Mission – population has grown older
  - **Length of stays for people staying in emergency shelters is much longer.**



- At permanent supportive housing, getting people back into the housing market is tougher because of lengthy requirements that landlords have.
- **General cost of housing has gone up**, gentrification in Hamlin Park has become a major issue since March 2020.
  - One-bedroom apartments going upwards of \$1,200 in the area.
- Since COVID, landlords are trying to recoup the money they lost during 2020, therefore making the cost of living unaffordable.
- **City of Buffalo has not addressed outsiders coming in and buying property to rent for high prices.** The city needs to look at who we are allowing to buy property.
- Too many landlords who are making profits off of apartments while cutting corners. They also many times are not willing to accept housing assistance.
- **The resources that were helping these organizations out during COVID just disappeared.** There were drop in homeless shelters that just disappeared and no people have nowhere to go.
- The accessibility of services is getting more difficult, many services require access to a phone which many people still do not have. **The “streamlining of services” cuts out an entire demographic of people.**
- HOPWA – Seeing a lot of new landlords coming in every couple month’s, then selling their property. Landlords from other places keep buying property, they also discriminate against people in ways that won’t get them in trouble.
  - Communication with seniors trying to find housing is an issue.
- What has been some of the changes your organization has made to try to mitigate some of the issues?
  - **Mandated workshops:** legal training, food & health training, know your housing options. If you are in the shelter at the time that the workshops are happening, you have to attend.
  - Put thousands of dollars into bus passes.
  - Providing language services
- Are more shelters needed?
  - **Yes**, there is a rise in eviction, and people ages 20-30 are starting to need homeless shelters more nowadays. They are already very young and do not know how to “do life”.
  - **More transitional housing is needed.** Shelters are currently acting like transitional housing and they need to get back to being emergency shelters. The more transitional housing that is added, the more room will become available at emergency shelters.
  - **More subsidized housing is needed.** Rent is still too high in Buffalo. People are not making enough to afford rent.
  - There is always a backlog of people in an emergency shelter that need to get into transitional housing.
  - Confidential Domestic Violence Housing is also needed. There is not enough safe housing for DV victims.
  - We need to collectively get together and find ways to add more units.

- We have very at risk populations that are in need of housing immediately: LGBTQ, Domestic Violence, foster children once they turn 18 end up abandoned.
- More safe spaces are needed for people who are experiencing severe mental illness.
- Buffalo is very segregated structurally which means services are also segregated.
- Source of Income Law
- There needs to be more of a combination of affordable housing and market rate.
- You have to help people that you put in new housing, you can't just leave them because the issues will continue. We must provide supportive programs.
- Tiny Homes being used as a means to create more housing for homeless populations. (This idea comes from Texas) How can it be translated here in Buffalo?
  - NYS has too many rules and regulations that we can't translate these things here.
- Regulations are preventing new shelters from being created many times. It requires a special use permit that does not allow it to be in residential neighborhoods. It is exclusionary.
- There is a lot of opposition to new shelters being built, because a lot of people in communities do not want them there. Tough conversations need to happen regarding classicism, racism, etc.
- Life skills are needed to be taught to people in shelters. The longer people are in shelters, the more they are going to revert to previous behaviors.

**Group #3 CHDOs & CBDOs**

6/26/24

**Time: 10AM**

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Consolidated Plan and AI Analysis*
  - a. Consolidated Plan: Discussion on how communities can make informed decisions on fund allocation based on comprehensive data.
  - b. AI Analysis: Jason highlighted the importance of analyzing civil conversations and the problems in America, focusing on affirmatively furthering fair housing.
2. *Federal Entitlement Dollars*
  - a. Participants discussion their familiarity with HOME, HOPWA, ESG funds, and CDBG funds
  - b. Leveraging funds: How different organizations are utilizing these funders for their projects.
3. *Project Updates and Pandemic Impact*
  - a. Michael Norwood (Buffalo Black Billion): Shared updates on various projects, including a \$57 million renovation of McCarley Gardens and a \$30 million renovation Of St. John Towers.
  - b. Devin Flowers (Lackawanna Housing): Discussed projects with Habitat for Humanity and the impact of the pandemic on project timelines.
4. *Employment and Training Center*
  - a. Changes Post Pandemic: Significant changes in workforce engagement, remote work, and layoffs.
  - b. Housing Needs: Many individuals seeking employment also face housing challenges.
5. *Partnerships and Leveraging Resources*
  - a. Michael Norwood (Buffalo Black Billion): Highlighted partnerships with the Buffalo Board of Education, Cornell Cooperative Extension, and others. Work with minority contractors.
  - b. Belmont Housing Resources: Discussed partnerships with community-based organizations and leveraging resources for housing projects.
  - c. Lackawanna Housing: Work a little bit with the Basilica, Our Lady of Victory. They work with Habitat for Humanity.
6. *Trends in Housing*
  - a. Modular Housing: Discussion on the benefits of modular housing, including cost and time efficiency.
  - b. Affordable Housing: The ongoing challenge of providing affordable housing and the need for better qualification processes.
  - c. Post-Purchase Education: People need education after getting into a permanent home on how to maintain it.

7. *Access to Capital*
  - a. Challenges: Difficulty in qualifying for housing loans and the need for banks to be more supportive.
  - b. First-Time Homebuyer Programs: Importance of detailed homebuyer training and post-purchase education. First-time homebuyer programs should be adjusted to provide better financial support in the homebuying process.
8. *Community Engagement & Planning*
  - a. Community Input: The need for genuine community engagement in planning and decision-making processes.
  - b. Government Processes: Lengthy and tedious processes for project approvals and the need for better communication and collaboration.
9. *Future of Housing*
  - a. Electric Mandate: Concerns about the cost implications of transitioning to all-electric homes by 2027.
  - b. Inventory and Supply: The need for more housing inventory and the challenges of high construction costs and mortgage rates.

**Key Takeaways:**

1. Enhance community engagement processes to meet community needs.
2. Bank Collaboration: Encourage banks to be more supportive and flexible in their qualification processes for housing loans.
3. First-Time Homebuyer Programs: Improve homebuyer training programs to include more financial education, post-purchase and financial support.
4. Modular Housing: Explore the potential of modular housing to address the need for affordable and efficient housing solutions.
5. Electric Mandate: Assess the financial impact of the 2027 electric mandate and explore funding options to support homeowners.

**Detailed Notes from Meeting**

- Question: What are some of the projects that your organization has going on and what transitions have you had to make due to the pandemic?
  - Buffalo Black Billion - multiple affordable housing unit renovations, affordable housing developments in the works. Much of the money they get is from private sources.
  - UDCDA – Mostly owner-occupied rehab, currently. They also have built a couple homes. They work with Cheektowaga and Amherst to put families into homes.
  - Lackawanna Housing - Owner occupied rehab. Home buyer assistance. Working with Erie county to build homes w/ Habitat for Humanity.
  - Buffalo Employment Training Center (BETC) – Huge changes to workforce due to the pandemic, hybrid work, layoffs, closings, etc. Mass populations not engaged in the workforce system. New Americans have populated the region, language has become a huge barrier, they need to find jobs. They are working to bridge the gap between education and the workforce. Nearly everyone they work with has “housing concerns or desires”.

- Youth are homeless, not eating, there is nowhere to send them. They can't be employed without having access to basic needs.
- Question: Talk about how you leverage your resources to provide services? (Partnerships)
  - Buffalo Employment and Training Center (BETC) – Have connected with Lackawanna/Buffalo Housing Authority. They need to get their patrons access to housing, food, daycare, etc.
  - Buffalo Black Billion - \$400 million dollars in assets on the ground, they have received funding from NYS Homes and Community Renewal for some of their affordable housing. They collaborate w/ the Buffalo Board of Education, Cornell Cooperative Extension. They work with minority contractors on their projects.
  - Lackawanna Housing – Work a little bit with the Basilica, Our Lady of Victory. They work with Habitat for Humanity.
  - Belmont Housing – They work with a lot of faith-based nonprofits that work within their respective communities. Relationships with True Bethel Baptist Church
- Question: What are some of the housing trends you are seeing and where do you see housing in the next 5yrs?
  - Lackawanna Housing – Modular Houses w/ Habitat for Humanity. Habitat may be planning to have their own factory in Buffalo. 2 Houses have been placed thus far. So far, they are working out well.
  - Buffalo Black Billion – Affordable housing is a human right, getting people to qualify to purchase a home is a challenge.
  - People need first time homebuyer education.
  - Post-Purchase Education. Once people are in a home they need to be educated on the upkeep and how to maintain their home.
  - The qualification process for affordable housing can be too much. The criteria to qualify is too much. Banks need to be apart of the conversation. "Banks set people up to fail".
  - Frustration over landlords not living here and not keeping care of the upkeep of their neighborhoods. "If more people owned their homes, neighborhoods would be better".
  - In 5 years, the key would be to improve the quality of life for the neighborhood and environment.
  - Town of Amherst – had to change their 1<sup>st</sup> time homebuyer programs because they are finding people with workforce level income that can't qualify for loans. **People need access to capital.**
  - Prices of homes are going to continue to escalate.
  - Governor wants to make everything electric by January of 2027 and people do not have the money to make those changes.
- Question: Talk about the government approval process and some of the challenges that come with that.
  - Process is lengthy, its very tedious, takes a long time.

- They feel that the government makes changes and spends money with little to no community engagement. They make decisions without talking to people.
- Federal & State regulations are what local municipalities are working within.
- The goal is single family development, but economically it is not making sense right now. The most immediate need is putting more housing inventory on the market.

**Group #4 Health and Human Services**

6/26/24

**Time:** 1PM

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Social Determinants of Health*
  - a. Lack of available/affordable housing stock.
  - b. Deteriorating infrastructure (plumbing, heating, etc.)
  - c. Transportation barriers: Changing NFTA bus routes.
  - d. Financial stability: low wages, cost of living too high.
  - e. Language barriers: Over 80+ languages represented in BPS alone.
2. *Domestic Violence*
  - a. DV cases have increased along with the severity of these cases
  - b. Lack of transitional housing for DV victims.
  - c. Need for more shelters overall.
3. *Funding Concerns*
  - a. Influx of funding during the pandemic, but was just cut off.
  - b. Nonprofits had to cut programs/services due to lack of funding.
4. *Needs of youth*
  - a. Services needed for school age children has increased.
  - b. Disparity between BPS and Suburban Schools.
  - c. Mental health services for children are in high demand.
5. *Aftermath of pandemic, 5/14 & Blizzard of '22*
  - a. Increased fear and need for security.
  - b. Increased need for food: People struggling to obtain groceries.
  - c. Nonprofits are at the forefront of disasters.
  - d. Behavioral health issues have increased.

**Key Takeaways:**

1. Address affordable housing.
2. Develop more shelters/transitional housing in general as well as for DV victims.
3. Address language barriers.
4. Increase services for school age children.
5. Increase funding to nonprofits.
6. Address transportation needs.

**Detailed Notes from Meeting:**

- Talk about your industry from 2020 to present, what are some of the changes you've noticed?

- Domestic Violence severity has increased, cases have peaked. Many cases are at the level of lethality.
- Behavioral health issues have increased, domestic violence cases seen at Catholic Charities has largely increased. There is also an increase need for food. Catholic Charities works w/ FeedMore WNY.
- Need for mental health services for children, waiting lists are longer than they've ever been.
- School age children's needs for services has increased. YMCA has seen an uptick in need young children.
- Children don't want to socialize, they have screens and they like to be at home. There has been a decrease in attendance at after school programs (specifically for teens).
- Red Cross has seen an increase in home fires. Risk of home fire has gone up and people have no where to go when this occurs.
- Catholic Charities works to resettle refugees, helping refugees find safe and affordable housing is a challenge more than ever.
- Disparity between BPS and Suburban School has grown majorly since COVID.
- COVID highlighted many of the issues that have been ongoing in our cities.
- There was an influx of funding that was tied to COVID, but then they were just cut off.
- Changes have not just occurred because of COVID but also because of 5/14 and the blizzard.
- Partnerships: Talk about the partnerships that your organizations have established to better provide services?
  - Catholic Charities has a strong partnership with FeedMore WNY
  - Align services to fit in with social determinants of health, and then finds partners to fit the needs within that.
  - Red Cross works very close with the county and department of social services. They work to meet with all partners in one room so that their clients can meet in one place with the services they need.
  - Community Organizations Active in Disaster (COAD)
  - Live Well Erie – County initiative that brings together agencies to work on issues surrounding the social determinants of health.
  - 716 Ministries, WNY women's foundation help to provide services for workforce programs.
  - Hiring a staff person just to manage partnerships for most of these organizations. It is hard to manage.
  - Nonprofits are at the forefront of disasters.
  - The County could help to connect the dots between partnerships. It would be a great place to start.
- Where do your resources come from and what programs do you have that have benefitted from them? (Specifically, during COVID)
  - PPP loans for Catholic Charities, they did not chase funding. They just had to shut down programs during COVID.



- How are your organizations dealing with the aftermath of the blizzard or 5/14?
  - Increased fear and need for security at YMCA, specifically from seniors. Also, trying to increase preparedness for disaster.
  - FeedMore WNY getting groceries for people in the aftermath of 5/14 (specifically victims' families).
  - Wellness time to work with young people
- Influx of new Americans is something that is competing with resources that are already so limited for the existing population.
- Gentrification is a serious problem happening in neighborhoods on the West Side and East Side.
- What are some of the social determinants of health that your organizations are dealing with?
  - Housing is one of the most basic needs, Catholic Charities is dealing with a lack of available housing stock.
  - Infrastructure of homes are a concern, heating/plumbing/etc.
  - Transportation barriers
    - Bus routes have changed and teens can't get to certain programs. NFTA cut bus routes.
  - General affordability, its hard to raise funds to support needs of people.
  - Safety within a home. If you have to choose between caring for your home and feeding your family, you're going to feed your family.
  - Language access. 80+ languages represented just in BPS.
  - Do people have a livable wage? Who is depending on them?
- Do we need more shelters?
  - Yes, there is only a handful of shelters within the city.
  - More shelters and transitional housing programs are needed.
  - Transitioning from affordable housing is something that needs to be focused on.
  - There is absolutely no transitional housing for victims of Domestic Violence.
  - Issues with separating families in shelters.
- How are you all preparing for the next 5 years?
  - Increase capacity, domestic violence shelters are overwhelmed.
  - Capacity building across the board
  - Red cross is seeing an huge uptick of disasters, climate change is becoming a major concern.
  - Fund positions to help build partnerships. Trying to find more ways to meet the needs of the patrons they serve.

**Group 5: Housing & Property Owners/Managers**

6/27/24

**Time:** 10AM

**Location:** Delevan Grider Community Center

**Attendees:** Approx. 10

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Homelessness & Special Needs Housing*
  - a. Need More Shelters: Shelters are overburdened, extended stays beyond temporary period are more common.
  - b. Need More transition to housing services: Insufficient options for individuals transitioning from shelters.
  - c. First Time Homebuyer Education Needed: Education will help to ensure long-term sustainability for homebuyers.
  - d. Need More Affordable Housing: Existing 'affordable housing' is not affordable. (Rents can range from \$1,300 to \$1,500 per month). Tax credits to develop affordable housing are very competitive.
2. *Public Housing Challenges*
  - a. Long wait lists (27 wait lists w/ a slowdown on one-bedroom units)
  - b. Unit Demand: High demand for 3-bedroom units (family units); surplus of 2-bedroom units.)
  - c. Sustainability Issues: (Tenants often face eviction due to inability to pay rent, even while in subsidized housing).
  - d. Family Self Sufficiency (FSS) Program: Limited success in transitioning individuals to homeownership.  
([https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/fs](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/fs))
  - e. Current public housing developments are located in areas that are not walkable and don't have access to needs such as supermarkets.
3. *Supportive Services*
  - a. Increased need for supportive services: Post-COVID, there is a higher demand for intensive support services.
  - b. Funding limitations: Limited funds for staffing support services.
  - c. Eviction Risks: Tenants unable to follow rules due to lack of support services.
  - d. Partnerships Challenge: Difficulty in partnering w/ service agencies for tenant support.
4. *Rental Market Dynamics*
  - a. Landlord-Tenant Relationship: Strained; increase in rent by landlords, many of whom are not local.
  - b. Section 8 Utilization: Decreased Utilization due to inability to find affordable housing.

- c. Small Area Fair Market Rents (FMRs): New HUD requirements to use zip code-based FMRs, affecting rent affordability.
- 5. *Maintenance & Security*
  - a. Maintenance Costs: Increased costs due to need for external vendors and higher material prices.
  - b. Security Costs: Significant increase in security expenses, post COVID.
  - c. Tenant Education: Need for education on budgeting and sustaining tenancy.
- 6. *Rural Housing Issues*
  - a. Unique challenges: Lack of transportation, healthcare, and grocery stores in rural areas.
  - b. Rural Community Development Hub: Organization created to focus on regional transportation, health disparities, and food insecurity.
  - c. Education: The public needs to be educated on what affordable housing truly means to enhance allowance for it within rural communities.

**Key Takeaways:**

1. Increase shelter capacity
2. Develop Transition Programs
3. Enhance Homebuyer Education
4. Address Affordable Housing
5. Improve Public Housing Sustainability
6. Strengthen Supportive Services
7. Monitor Rental Market
8. Enhance Maintenance and Security
9. Focus on Needs of Rural Communities

**Detailed Notes from Meeting:**

- **Question:** What are some of the changes you've seen post pandemic?
  - Increased construction costs, development budgets are completely blown out of proportion. Multiple funding sources are required.
  - Insurance costs once a project is developed has majorly increased.
  - Services that are needed are much more intense than ever before.
    - The capital and resources are just not available to meet service needs.
    - Service examples that are needed: Nursing/medical care, domestic housekeeping
  - Section 8 usage dropped dramatically post COVID.
  - Security costs increased after COVID
  - Maintenance costs increased
- **Question:** What are some of the additional funding sources that you are acquiring for your projects?
  - Some sources from Erie County but the requirements can be difficult to meet.

- (SRDI) Small Rental Development Initiative – one of the funding sources for smaller projects. (A project in East Aurora & Batavia has been developed using these funds)- <https://hcr.ny.gov/SRDI> (SRDI overview)
- **Question:** What are some of the impediments your organizations are facing when it comes to housing?
  - **No capacity** to do anything in rural areas. They need staffing, units, capital, etc. Developers won't work in rural areas because the projects are too small. Rural affordable housing needs to be considered as much as urban areas.
    - **Currently, rural affordable housing is struggling with not having the capital and having issues with funding sources not wanting to work in rural areas. Rural areas also have no transportation or healthcare access. There are zero services out in these areas. Rural poverty is completely overlooked. Incidents of domestic violence/food insecurity are severe.**
    - *Rural Community Development Hub* has been formed to focus on a regional transportation network. You cannot solve housing in rural areas without considering transportation.
  - Education needs to be considered on what affordable housing is. Many people are opposed to it because they think it will hurt their neighborhoods. People need to understand what affordable housing is. (Especially in rural communities)
- **Question:** Talk about the partnerships and the projects you are working on? What partnerships do you need?
  - Multiple funding sources were brought in for Mt. Olive Senior Manor (Project done by People Inc.), subsidy vouchers, working with Mt. Olive Church.
  - Protective services (people to provide mental health services, cash flow, etc.)
  - Agencies with replacement furniture are needed.
  - Agencies with household items.
  - State agencies identify areas of need and priorities and therefore the projects are determined based upon those. Developers who seek subsidies/tax credits compete for those projects that are identified.
  - **Tax credit funding is very competitive right now.**
  - Partnerships w/ low cost funders are needed.
  - CDFIs provide a vital funding source that are not met by government. <https://www.cdfifund.gov/>
  - Perry/Schaffer public housing are not in areas with supermarkets. Access to food is necessary. They are not located in communities. Find partnerships with grocery stores, the people in these housing developments need access.
  - Partners to fund commercial development surrounding affordable housing. Non-housing economic development have not enough funding.

- **Question:** What do we do in the affordable housing arena to meet the needs of the population?
  - Rent costs are too high and are not sustainable. People in public housing are even struggling to afford their rents.
  - Families need larger units in public housing and affordable housing overall. 2 bedrooms are not needed, 3+ bedrooms are needed for families now.
  - There are not enough resources for transitioning people from public housing into homeownership/regular market.
  - Place services within the buildings that people are living in.
  - Relationships and trust need to be established with people living in developments and their service providers.
  - Build housing in areas that are walkable, vibrant communities.
  
- **Topic: Development/Landlord side:**
  - Landlords need to increase their rents because of general cost increases.
  - Belmont is finding themselves giving out less subsidy vouchers because rents are so expensive.
  - Into 2025 Small Area FMRs will be used – Zip code based FMRs to establish rent costs. Per unit costs will increase on the development side.  
<https://www.huduser.gov/portal/datasets/fmr/smallarea/index.html>
  - Taxes/Utility Costs have increased and landlords have no choice but to increase their rents.
  - Rents used to be able to be gradually increased but now they can't. The prices need to be increased rapidly. (It is a systemic issue, not price gouging)
  
- **Topic: Tenant Side:**
  - Marine Drive Apartments rent will be increased about \$40 a month for 1-bedroom apartments. They had to do tenant outreach to try to educate the tenants about why their rents are increases)
    - **Tenant Education is needed (how to budget class, computer classes, transportation classes)**
  - Transportation concerns. Timing of buses has changed, people can't get to where they need to be (specifically seniors)
  - There needs to be funds to help people on an intermittent bases to help with small gaps in income. (Such as during the storm in 2022, people were not working for a week and therefore couldn't pay their rents)
  - Evictions seem to be increasing and therefore they end up in court.
  - Maintenance response times/security issues making people move out.

- **Topic: Maintenance: what are the costs your seeing?**
  - Maintenance costs have increased, techs to perform maintenance don't have the knowledge most times to make repairs and therefore they need to outside source.
  - Wait times for maintenance are long. They are focusing on emergencies and items that will affect inspection scores.
  - Avg. turnaround costs for 3+ bedroom apartments in public housing can be anywhere from \$7,000 to \$10,000
  
- **Question: In the next 5 yrs. how do we plan to add capacity and spend our funds? What do the next 5 yrs. Look like? What will drive your development decisions going forward?**
  - Size of developments (used to be smaller now bigger projects are more viable)
  - Rental subsidies
  - Service providers need.

**Group 6 Advocacy and Fair Housing Organizations**

6/27/24

**Time:** 1PM

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Tenants' Rights/ Housing Discrimination*
  - a. Increased housing discrimination reports to HOME. (Familial status, disability, race, gender)
  - b. Landlords are becoming bolder with their requirements for renters.
  - c. Higher instances of maintenance issues with rentals. (Landlords not fixing rentals)
  - d. Landlords finding ways around accepting section 8.
  - e. Buffalo tends to be informal and many tenants do not have a written lease to protect them.
  - f. Not enough enforcement of fair housing laws.
2. *Affordable Housing Stock*
  - a. Need to increase available affordable housing stock. (Specifically, for single persons or families)
  - b. Affordable housing tax credits only require developers to keep the housing affordable for a certain period of time.
  - c. Too many strings attached too funding for affordable housing.
3. *Education*
  - a. Education programs for tenants need to be more available so people know their rights.
  - b. Education programs need to be provided for landlords so that they know the laws surrounding fair housing.
  - c. Many new Americans who become landlords do not understand fair housing laws.

**Key Takeaways:**

1. Increase education programs on fair housing laws.
2. Increase enforcement of fair housing laws.
3. Address affordable housing.

**Detailed Notes from Meeting:**

- Question: What changes have you noticed in your industries post pandemic?

- At HOME, more reports of housing discrimination than ever before. More people are coming to HOME, rather than HOME finding them. There is some rise in level on discrimination overall.
  - What are some of the issues you get calls about? **Calls from tenants who have landlords just trying to evict them.** People who can't pay their rent, there is nothing HOME can do for this. **Familial status is one of the most common types of discrimination that is received.**
- After the eviction moratorium, landlords are becoming bolder with what they do. They have more restrictions on who they rent too and landlords are not being held accountable because there is no one to check them.
- Raise in rents, many corporate entities are purchasing properties in Buffalo which leads to an increase rent.
  - Corporate entities are less helpful and willing to work with their tenants
- Small "mom and pop" landlords left the business after the eviction moratorium. They were not getting paid and could not stay in business.
- **Prices have increased, incomes have not.**
- Question: What are the top 3-5 items we need to educate tenants on?
  - Condition issues, how do you remain within the law while trying to negotiate issues (such as maintenance) with their landlord.
  - Good cause eviction laws
  - There is a new NYS law that allows tenants to take their landlords to court over issues ongoing in their apartment without having to withhold rent.
- Question: What are the things that landlords need to be educated on?
  - They need to maintain their properties.
    - Tenants are complaining of major issues that landlords have needed to fix for years
  - If you are dealing with new Americans as landlords, they are not aware of the laws that they must follow.
  - Are there resources out there for smaller landlords who need the funds to maintain their properties so that they can follow laws.
  - Educate them on how much things cost, how much maintaining a property will be.
- Question: How did these organizations manage landlord/tenant relationships during the pandemic?
  - Everyone assumed the worst of each other, they blamed each other for issues that were neither parties' fault.
  - Trying to keep relationships good through providing support to tenants, but eventually a landlord will evict a tenant if it is in the best interest of their business.
- Affordable housing is being built by funders who have too many strings attached.
- The housing stock in Buffalo is old and there is a lot of issues stemming from that.
- There is not enough housing stock that is affordable for either single persons or families.



- People do not have enough excess income to qualify for affordable properties and market rate.
- **Question: What would it take to have a sustainable tenant?**
  - **Raise in incomes**, no matter what financial education you give, you cannot help someone who does not have a sustainable income.
  - A major issue with section 8, there are too many requirements and tenants can't find a place that meets them. Therefore, they end up losing their section 8.
    - *Source of income discrimination law* – landlords are not allowed to refuse section 8, but they have found ways around that. Landlords can come up with another reason why they did not accept the tenant with section 8 and then there is no case for discrimination.
    - Average wait for section 8 is about 11yrs at the moment.
    - Landlords on the side are charging people with section 8 extra on the side and people are paying them (even though its illegal) because they are afraid of losing their vouchers.
- **Question: Are your organizations partnered with anyone who is providing services to tenants that help them become sustainable?**
  - Many of these organizations provide the services on their own.
    - These services include: budgeting classes, financial literacy, etc.
- Erie County Fair Housing Board was created in 2018. Cases have to be brought to HOME first and then can be brought before the board, there has been an uptick of cases in recent years. Still not a high amount. No cases have officially been brought to court.
- **Question: How many cases are brought before your organizations that are race related?**
  - Race is usually one of the top 4 discrimination issues brought before HOME. The top issues are familial status, race, gender, persons with disabilities.
    - Persons with disabilities cases tend to be over accommodations. Landlords unwilling to make reasonable accommodations for a disability.
  - There are cases of people being denied due to their race or treated differently.
  - New Americans Landlords, there are more of them. They don't understand that they can't ask questions about ethnicity. New Americans typically are more comfortable renting to people that speak their language or are within the same culture. There is a language barrier as well that prevents full understanding of the law.
- **Topic: Talk about notice requirements/lease requirements**
  - Landlords do not have to have a reason for eviction with month to month tenants.
  - Lease agreements fall back to the law. What the law says is what ultimately wins out.
  - Buffalo has a culture of informality, not a lot is placed into righting and it's a lot of handshake agreements.
- Buffalo does not enforce fair housing enough.
- FMR in Buffalo does not seem to be correct right now.

- There needs to some group that comes together to identify the needs and targeting those areas. It would be helpful if there was some community center that helped developers identify what developments the community needs.
- Affordable housing requirements through tax credits, developers only keep units affordable for as long as they need too, then they fizzle out.
- More grants need to be available for the rehabilitation of homes.
- Accessible housing for families virtually does not exist.

**Group #2 Homelessness & Special Needs Housing**

6/28/24

**Time:** 10 AM

**Location:** Delevan Grider Community Center

**Meeting Summary:**

**Main Topics of Discussion:**

1. *Climate Action Plan*
  - a. Heavy public input from community and stakeholders
  - b. Infrastructure challenges in WNY
  - c. EPA money is a great resource but trouble finding applicants with capacity to take the lead
2. *Coordination on emergency response*
  - a. Preparedness tends to be soloed
  - b. COVID made the disconnect worse
  - c. Broadband connection key to some facets of coordinated responses
3. *New Construction and Healthy Homes*
  - a. All Electric Buildings Act
  - b. Geothermal options showing high efficiency
  - c. Weatherization programs and emergency roof programs married to create new solar
  - d. Incentives tend to be mismatched and don't respond well to housing for families

**Key Takeaways:**

1. Lower income neighborhoods and households at higher risk of negative impacts of climate change and extreme weather
2. There are good incentives and programs to mitigate hazards, but coordination and capacity need to be addressed
3. Many of the new building techniques and proposed mandates need to be folded into construction and renovation programs
4. There is a need for more warming and cooling stations throughout Erie County – urban and rural

**Chuck Bell**

---

**From:** Celina Bryan <cbryan@harvesthousebuffalo.org>  
**Sent:** Monday, July 1, 2024 3:04 PM  
**To:** Chuck Bell  
**Subject:** additional comment

Hello,

I attended both sessions at the Delevan Grider center as well as today's ZOOM.

Something that I forgot to bring up, which was originally brought up on 6/25/24 by Jessica Starks but no one delved more into it due to the meeting wrapping up that day. This was the idea of a community of tiny homes for the transient or emergency shelter populations. The response from a developer in attendance was that tiny homes are too expensive to purchase and bring over and that is why it doesn't exist here. Others after, have talked about how there are cost effective ways to build a community of tiny homes such as local work development classes or carpentry/plumbing certification programs building the communities as part of their cores credit hours or shadowing projects. Also, many materials should be donated through sponsoring organizations. All kinds of wants to get the ball rolling on something like that.

**Celina Bryan**

Director of Housing  
Cbryan@harvesthousebuffalo.org  
716-855-4654 x235  
<https://www.harvesthousebuffalo.org/>

**Harvest House Buffalo**

175 Jefferson Ave Buffalo, NY 14210



## Stakeholder Meetings Sign In-Sheets

- Regional Agencies and Economic Development
- Homelessness and Individuals with Special Needs
- Community Based Development Organizations and  
Community Housing Development Organizations
- Health and Human Services
- Housing: Property Owners and Managers
- Advocacy and Fair Housing
- Resilience and Emergency Management

AI/Con Plan Stakeholder meeting  
 Delavan Grider Community Center  
 877 E. Delavan Buffalo 14215

Regional Agencies/Ec Dev

6/25/2024 @10AM

AGENCY/COMPANY	CONTACT INFORMATION
Town of Cheektowaga	RACHAEL STRAIKER (716) 897-9200 RSTRAIKER@tucny.org
NYS DOT	Mohammed Alhajjeh 716-847-3519
Southtowns Regional Chamber	Jamie Decker 716-449-7917 jamie@southtownsregionalchamber.org
The Harrison Studio	Chuck Bell 716-462-6600 chell@harrisonplacestudio.com
Hallmark Planning + Dev	Art Hall 716-486-9763 art@hks/hallmarkpln.com
Hallmark Planning + Dev	Cambridge Bay 716-488-4782
Hallmark Planning + Development	Courtney Kincannon (716) 3481939 Courtney@thehallmarkfirm.com
Hallmark Planning + Development	Kate Segarra (716) 939-6501 kate@thehallmarkfirm.com
GBNRTC	Amy Weymouth 716-856-1026 amy.woyouth@gbnrtc.org
City of Buffalo	Maria Chudg (716) 851-5123 mmelchiorre@buffalony.gov
Town of Amherst	Laure Stillwell (716) 631-7050 lstillwell@amherst.ny.us
NFTA	Nadine Chalmers (716) 855-7231 nadine.chalmers@NFTA.com
BENLIC	Jocelyn Gardan (716) 243-3996 j.gardan@benlic.org
City of Buffalo	Lisa Hicks 716-578-4545 lhicks@buffalony.gov

6/25/2024 @10AM

[illegible]

AI/Con Plan Stakeholder meeting  
 Delavan Grider Community Center  
 877 E. Delavan Buffalo 14215

Homeless/Special Needs

6/25/2024 @ 1PM

AGENCY/COMPANY	CONTACT INFORMATION
YWCA WNY	Talisa King thing@ywca-wny.org
Saving Grace Ministries	Trace Gillis - trace.gillis@sgmworld.org
"	Derek Betts - derek.betts@sgmworld.org
My Place Home Shelter	Jaslyn Beiggins jaslyn.bh@gmail.com
My Place Home Shelter	Kate Ayler kaitlin.ayler@MPH14211.org
PEACEPRINTS OF WNY	JANITA EVERHART jeverhart@peaceprintsony.org
Peaceprints of WNY	Lindsey Allen lallen@peaceprintsony.org
The Salvation Army	Mia Clark Mia.Clark@usa.salvationarmy.org
Child/Family Services	Tiffany Pavone tpavone@cfsbny.org
Single site shelter/depaul co	Traci Janger Tranger@depaul.org
HABITAT FOR HUMANITY BUFFALO	Rick Folger RFOLGER@HABITATBUFFALO.ORG
CITY OF BUFFALO/COMM SERV.	JESSICA LEAH STARKS JSTARKS@BUFFALO.NY.GOV
Salvation Army	Jennifer Arroyo - 716-888-1238 jennifer.arroyo@usa.salvationarmy.org

use  
 Jennifer Arroyo  
 or



**6/25/2024 @ 1PM**

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6/27/2024 @1PM

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AI/Con Plan Stakeholder meeting  
Delavan Grider Community Center  
877 E. Delavan Buffalo 14215

Advocacy/Fair Housing

6/27/2024 @1PM

AGENCY/COMPANY	CONTACT INFORMATION
International Institute of Buffalo	716-883-1900
International Institute of Buffalo	jpaculazzo@iibuff.org
Beyond Support Network	m.hennig@beyondway.org

6/27/2024 @1PM

[illegible]

6/27/2024 @10AM

[illegible]

6/26/2024 @ 1PM  
6/27/2024 10am

[illegible]

6/27/2024 @10AM

[illegible]

6/28/2024 @10AM

[illegible]

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 05/19/2025		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>5a. Federal Entity Identifier:</b> B-25-UC-36-0001		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Erie County		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 16-6002558		<b>* c. UEI:</b> F5NUNMMKAXM9
<b>d. Address:</b>		
<b>* Street1:</b> 95 Franklin Street		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> Buffalo		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> NY: New York		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 14202-3967		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Environment and Planning		<b>Division Name:</b> Community Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.		<b>* First Name:</b> Paul
<b>Middle Name:</b> J.		
<b>* Last Name:</b> D'Orlando		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Principal Contract Monitor		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> 716-858-2194		<b>Fax Number:</b> 716-858-7248
<b>* Email:</b> <input type="text"/>		



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

CDBG program funds used for infrastructure improvements, economic development and housing rehabilitation assistance for low income areas of the Erie County Consortium.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="2,994,630.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="437,000.00"/>
* g. TOTAL	<input type="text" value="3,431,630.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**Prefix: \* First Name: Middle Name: \* Last Name: Suffix: \* Title: \* Telephone Number: Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

**Applicant and Recipient  
Assurances and Certifications**
**U.S. Department of Housing  
and Urban Development**

 OMB Number: 2501-0044  
 Expiration Date: 02/28/2027

**Instructions for the HUD-424-B Assurances and Certifications**

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

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

\*Authorized Representative Name:

Prefix:  \*First Name:   
 Middle Name:   
 \*Last Name:   
 Suffix:   
 \*Title:   
 \*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.
2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

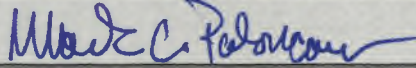
is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.
6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.
7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.
9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

**WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

\*Signature:

A rectangular box containing a handwritten signature in blue ink. The signature appears to be "Mark C. Palomares".

\*Date:

May 19, 2025

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 05/19/2025		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>5a. Federal Entity Identifier:</b> M-25-UC-36-0507		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Erie County		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 16-6002558		<b>* c. UEI:</b> F5NUNMMKAXM9
<b>d. Address:</b>		
<b>* Street1:</b> 95 Franklin Street		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> Buffalo		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> NY: New York		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 14202-3967		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Environment and Planning		<b>Division Name:</b> Community Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.		<b>* First Name:</b> Paul
<b>Middle Name:</b> J.		
<b>* Last Name:</b> D'Orlando		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Principal Contract Monitor		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> 716-858-2194		<b>Fax Number:</b> 716-858-7248
<b>* Email:</b> <input type="text"/>		

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnership Program

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

HOME program funds used for housing rehabilitation and rental assistance for low income residents of the Erie County Consortium.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="921,686.76"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="215,000.00"/>
* g. TOTAL	<input type="text" value="1,136,686.76"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**Prefix: \* First Name: Middle Name: \* Last Name: Suffix: \* Title: \* Telephone Number: Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

# Applicant and Recipient Assurances and Certifications

U.S. Department of Housing  
and Urban Development

OMB Number: 2501-0044  
Expiration Date: 02/28/2027

## Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

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

\*Authorized Representative Name:

Prefix:  \*First Name:   
 Middle Name:   
 \*Last Name:   
 Suffix:   
 \*Title:   
 \*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

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6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

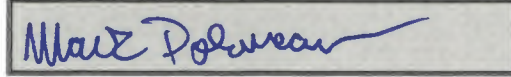
9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.



I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

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\*Signature:

A rectangular box containing a handwritten signature in blue ink that reads "Mark Polunin".

\*Date:

May 19, 2025

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 05/19/2025		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>5a. Federal Entity Identifier:</b> E-25-UC-36-0001		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> Erie County		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 16-6002558		<b>* c. UEI:</b> F5NUNMMKAXM9
<b>d. Address:</b>		
<b>* Street1:</b> 95 Franklin Street		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> Buffalo		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> NY: New York		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 14202-3967		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Environment and Planning		<b>Division Name:</b> Community Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.		<b>* First Name:</b> Paul
<b>Middle Name:</b> J.		
<b>* Last Name:</b> D'Orlando		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Principal Contract Monitor		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> 716-858-2194		<b>Fax Number:</b> 716-858-7248
<b>* Email:</b> <input type="text"/>		

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant Program

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

ESG program funds used for assistance for the homeless population of the Erie County Consortium. Assistance included homeless prevention, rental assistance and stabilization services.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="234,812.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text" value="217,202.00"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="452,014.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

**Applicant and Recipient  
Assurances and Certifications**
**U.S. Department of Housing  
and Urban Development**

 OMB Number: 2501-0044  
 Expiration Date: 02/28/2027

**Instructions for the HUD-424-B Assurances and Certifications**

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

\*Authorized Representative Name:

Prefix:  \*First Name:   
 Middle Name:   
 \*Last Name:   
 Suffix:   
 \*Title:   
 \*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

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5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

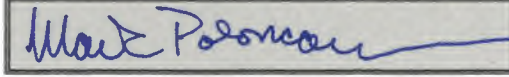
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

**WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

\*Signature:

A rectangular box containing a handwritten signature in blue ink. The signature appears to be "Mark Poloncar" with a long horizontal flourish extending to the right.

\*Date:

May 19, 2025



## CERTIFICATIONS

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

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

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

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

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

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

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

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 170111) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

5/19/2025

Date

Erie County Executive

Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2025, 2026, 2027 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

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


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



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

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

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



Signature of Authorized Official

5/19/2025

Date

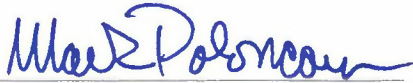
Erie County Executive

Title

## OPTIONAL Community Development Block Grant Certification

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

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



Signature of Authorized Official

5/19/2025

Date

Erie County Executive

Title

## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

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

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

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

  
Signature of Authorized Official

5/19/2025

Date

Erie County Executive

Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

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

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

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

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

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



Signature of Authorized Official

5/19/2025

Date

Erie County Executive

Title

## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

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

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

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

# TOWN OF HAMBURG, NEW YORK

2025 “Final” Consolidated Plan  
2025 “Final” Action Plan  
April 1, 2025 - March 31, 2026  
**(2025 Program Year)**



## Hamburg Town Board

Supervisor Catherine A. Rybczynski  
Councilman Frank M. Bogulski  
Councilwoman Megan A. Comerford  
Councilwoman Elizabeth C. Farrell-Lorentz  
Councilman Daniel M. Kozub

## Hamburg Community Development

Christopher Hull; Director  
Timothy Regan; Assistant Director



**Summary of 2025 CDBG Projects/Funding - Program Income - HOME Funds**  
**2025 Final Funding**

<b>Town of Hamburg 2025 Community Development Block Grant:</b>	<b>\$445,160.00</b>
Housing Renovation Conditional Grants	\$150,000.00
Town of Hamburg Infrastructure Reconstruction (Hamburg Highway)	\$140,160.00
First Time Homebuyer Conditional Grants	\$ 80,000.00
Village of Blasdell; Infrastructure Reconstruction (Salisbury Avenue)	\$ 75,000.00
<b>2025 CDBG "Program Income":</b>	<b>\$100,000.00</b>
Housing (Program Income)	\$ 25,000.00
Economic Development (Program Income)	\$ 75,000.00
<b>TOTAL 2025 CDBG Funding:</b>	<b>\$545,160.00</b>

<b>2025 HOME Program Funds (Erie County Consortium)</b>	<b>Total Grant</b>	<b>\$152,078.00</b>
	<b>\$ 38,020.00</b>	
Administration (Consortium)	\$ 15,208.00	
CHDO (Consortium)	\$ 22,812.00	
Housing Renovation Conditional Grants for Income Eligible		<b>\$114,058.00</b>
<b>TOTAL 2025 FUNDING (CDBG &amp; HOME FUNDS):</b>		<b>\$659,218.00</b>



## Executive Summary

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

#### 1. Introduction

The Town of Hamburg, New York is a federal entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program.

The Town of Hamburg also receives HUD Home Investment Partnerships (HOME) Program funding through their participation in the Erie County/Town of Hamburg HOME Consortium. These funds are distributed through Erie County.

As a HUD entitlement community, the Town of Hamburg is 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 the Town. This CP covers the period from FY 2025 through FY 2029 (April 1, 2025 to March 31, 2029).

#### 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 (LMI) 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 summary, a housing market summary, and a strategic plan that identifies those priority housing and community development needs and strategies that the Town will use with the available 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.

## **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 for the next five years using CDBG and HOME funds. The three overarching objectives guiding the proposed activities are:

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

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

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

The overall goal of the Community Development Block Grant (CDBG) program is the development of viable urban/suburban communities that will provide decent housing, a suitable living environment and expanded economic opportunities, principally for low-to-moderate income persons. The Town of Hamburg has shifted away from making loans for housing rehabilitation programs and is now only lending for rehabilitation as part of the Mobile Home Renovation Loan Program. This shift from loans to grants through the Housing Renovation Program is reflective of the high priority the Town is putting on maintaining quality housing and housing stability for low- and moderate-income residents.

The Town also uses CDBG funds to create a suitable living environment by funding public services, especially in the wake of COVID-19. The Town of Hamburg will continue to utilize partners like Belmont Housing Services of WNY, Housing Opportunities Made Equal (HOME), the Center for Elder Law &

Justice, Neighborhood Legal Services, and Sts. Peter and Paul Outreach to provide public services to the residents of the Town.

### **3. Evaluation of past performance**

Despite the difficulties in spending funds in a consistent and efficient manner due to COVID-19, the Town of Hamburg is administering its federal CDBG and HOME funds in an effective and compliant manner. The Town of Hamburg generally identifies and expends annual program funding within the same year it was awarded. As of January 31, 2024, the Town has achieved HUD timeliness standard.

The following provides a brief summary highlighting key achievements in the major funding categories: Community Projects, Economic Development, Housing and Continuum of Care.

Community Projects: Two (2) major projects were completed in 2023 including one each in the Village of Blasdell and one within the Town of Hamburg. Both of these projects involved infrastructure reconstruction, and specifically road reconstruction within the Village of Blasdell and the Town of Hamburg. Both projects were in HUD target areas. The road reconstruction projects benefited 5,900 low/moderate income people.

Housing: The Town of Hamburg Department of Community Development's housing programs assisted seventeen low/moderate income households in 2023. This amount seems small at first glance, but what is not stated is that eleven households assisted were with CDBG funding. Six of the households assisted were with HOME funds. The Town expended a large amount of time and money trying to spend out of HOME funding which is tied in with the Erie County HOME Consortium. This is where limitations in staffing capacity are an issue. The time and effort required to commit and expend HOME funds limits the ability to have a large impact with CDBG expenditures.

Continuum of Care: Promotes town-wide commitment to end homelessness by providing grant funds to ensure that individuals and families remain within their dwellings while other services are offered to them promoting access to and effective utilization of other mainstream programs. Nine families were assisted through this program to prevent homelessness.

Economic Development: Economic development is an important part of strengthening communities. The ability for local government to have economic development opportunities for its business community is a primary function of a healthy local economy. In this instance, the Town of Hamburg utilizes its Community Development Block Grant (CDBG) program to create and retain jobs for the community that would have otherwise not be created or retained. By working with other government entities, the local economy can be strengthened as part of a larger, regional area. The Hamburg Town Board has chosen to utilize a sub-recipient to administer its economic development program with the use of its Community Development Block Grant (CDBG) funds. The Hamburg Development Corporation (HDC) assisted one (1) business in PY 2023 for job creation/retention.

#### **4. Summary of citizen participation process and consultation process**

The Town of Hamburg is committed to having as much input and participation from its residents as it can get, especially when developing its plans, programs and activities that utilize federal funding. To this end, the Town of Hamburg Department of Community Development welcomes and openly solicits participation from its residents on all issues pertaining to its Community Development Block Grant (CDBG) program and the Home Investment Partnership (HOME) Program. In order to facilitate this participation from town residents the Town of Hamburg Department of Community Development will follow this "Citizen Participation Plan" and any future updates to said plan that are required or necessitated.

Four (4) public hearings were held during summer/fall, 2024 as part of the Consolidated Funding planning process. A summary of the specific comments per hearing is listed below:

- September 16, 2024 @ 7:00 p.m. (Hamburg Community Development)
- September 23, 2024 @ 7:00 p.m. (Hamburg Community Development)
- October 7, 2024 @ 7:00 p.m. (Hamburg Community Development)
- October 19, 2024 @ 12:00 p.m. (Hamburg Community Development)

The formal public comment period on the Draft 2025-2029 Consolidated Plan extended from January 10, 2025 to February 10, 2025. A public hearing was held on January 22, 2025 to accept comments on the draft plans. The public hearing was advertised in the Buffalo News and on the website of the Town of Hamburg Community Development.

See the Citizen Participation Appendix for all meeting summaries, comment sheets, and summary of community needs survey.

#### **5. Summary of public comments**

Comments received during the public hearings are listed by date and type below:

Monday, September 16, 2024: One person attended the public hearing to listen to the two presentations about the CDBG and HOME programs. The presentations were provided by Erie County Department of Environment and Planning and The Town of Hamburg Department of Community Development. A local television station attended the public hearing and completed a news story that night on the hearing/event. No e-mail requests were received for this hearing period.

Monday, September 23, 2024: No one attended the public hearing. Four e-mail requests were received. All four e-mails pertained to requests for childcare micro-enterprise assistance for WeeCare, Inc. dba as Upwards. (As a footnote, there was a home Buffalo Bills game that night which definitely influenced hearing attendance).

Monday, October 7, 2024: Four people attended the public hearing looking for information pertaining to fair housing and rental assistance issues. A discussion of local, county, and state fair housing laws ensued. Additionally, affordable housing pertaining to rental units within the town was discussed. Specific information and contacts were provided. Five e-mail requests were received. All five e-mails pertained to requests for childcare micro-enterprise assistance for WeeCare, Inc. dba as Upwards.

Saturday, October 19, 2024: No persons attended the public hearing, however, a representative for the firm completing the Analysis of Impediments to Fair Housing and the Five-Year Consolidated Plan was in attendance to answer any questions on the two documents. No e-mail requests were received for this hearing period.

\* The nine e-mails received from various persons/e-mail addresses could not be verified as Town of Hamburg residents. Requests for information on address and/or business were sent to each e-mail submitter twice with no response from any of the nine persons claiming to have interest in Hamburg issues.

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

All comments or views were accepted.

## **7. Summary**

In summary, the Consolidated Plan and Annual Action Plan have been developed with community input and reflect the needs of the Town of Hamburg.

## The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Hamburg	Department of Community Development
HOME Administrator	Hamburg	Department of Environment & Planning

**Table 1– Responsible Agencies**

### Narrative

The Town of Hamburg Office of Community Development is primarily responsible for administering programs covered by the Consolidated Plan.

### Consolidated Plan Public Contact Information

Christopher Hull, Director, of Community Development

The Town of Hamburg, Department of Community Development

6100 South Park Avenue

Hamburg, NY 14075

Phone: 716.648.6216

Email: [chull@townofhamburgny.gov](mailto:chull@townofhamburgny.gov)

## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The Town of Hamburg, as part of the Erie County Community Development Block Grant (CDBG) Consortium, Amherst, Cheektowaga, and Tonawanda HOME Consortium, and the City of Buffalo developed a single, extended public participation and consultation process for their respective Five-Year Consolidated Plans and Analysis of Impediments to Fair Housing. A coordinated outreach effort was developed to maximize input from a large cross section of stakeholders including citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care. Outreach initiatives primarily focused on stakeholder meetings, one-on-one and group interviews, and a community development needs survey submitted to municipal officials within the Consortium. These efforts ultimately helped shape the outcome of this plan.

### **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)).**

During the final week of June 2024, the Town of Hamburg and the Erie County Consortium held focus groups with a large cross section of stakeholders to discuss the Five-Year Consolidated Plan and funding priorities. The outreach effort further included public meetings, notices, interviews, and a community development needs survey. In addition, the Hamburg Department of Community Development implements a range of affordable housing and community development activities, including administration of the CDBG and HOME programs; preparation of the Consolidated Plan (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.

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

### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The Town of Hamburg's Homeless Prevention Program (HPP) is funded by CDBG Program Income funds on an "as needed" basis. The goal of the HPP is to provide temporary assistance to low/moderate income persons/families that are at risk of becoming homeless or will otherwise become homeless. Financial assistance is only provided to persons/families who are the most likely to achieve and maintain



stable housing once assistance has been provided. The program aims to stabilize an existing household to the point where other, more permanent services can be provided by other service providers. The HPP provides rent arrears/short-term rental assistance and utility arrears assistance for a maximum of three months to approved, qualified households/families. As part of the Town's HPP, Hamburg Community Development works with "The Center for Elder Law & Justice" and "Neighborhood Legal Services" to provide free legal assistance to qualified residents dealing with evictions, eviction issues, or other eligible legal services.

Within the Erie County Consortium, two HUD-certified housing counseling agencies 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 chief obstacle to meeting underserved needs is a lack of or inadequate, resources - both financial and human (staffing). The Town of Hamburg will continue to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the service needs of its residents. The Town of Hamburg will support the efforts of service agencies in Erie County to maximize the use of available resources and to obtain additional resources whenever possible. The Town of Hamburg 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**

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

1	<b>Agency/Group/Organization</b>	AMERICAN RED CROSS
	<b>Agency/Group/Organization Type</b>	Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
2	<b>Agency/Group/Organization</b>	Belmont Housing Resources for WNY, Inc.
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
3	<b>Agency/Group/Organization</b>	Buffalo Municipal Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
4	<b>Agency/Group/Organization</b>	Center for Elder Law and Justice
	<b>Agency/Group/Organization Type</b>	Service - Legal
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
5	<b>Agency/Group/Organization</b>	HOMELESS ALLIANCE OF WESTERN NEW YORK
	<b>Agency/Group/Organization Type</b>	Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
6	<b>Agency/Group/Organization</b>	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
7	<b>Agency/Group/Organization</b>	Legal Aid Bureau of Buffalo, Inc.
	<b>Agency/Group/Organization Type</b>	Service - Legal
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
8	<b>Agency/Group/Organization</b>	Neighborhood Legal Services
	<b>Agency/Group/Organization Type</b>	Service - Legal
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
9	<b>Agency/Group/Organization</b>	Office for People with Developmental Disabilities
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
10	<b>Agency/Group/Organization</b>	People Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
11	<b>Agency/Group/Organization</b>	Rental Assistance Corporation of Buffalo
	<b>Agency/Group/Organization Type</b>	Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
12	<b>Agency/Group/Organization</b>	WNY Office of People with Developmental Disabilities
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
13	<b>Agency/Group/Organization</b>	Saints Peter and Paul Parish Outreach and Food Pantry
	<b>Agency/Group/Organization Type</b>	Food Pantry
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

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

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

#### Other local/regional/state/federal planning efforts considered when preparing the Plan

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care		
2024 Hamburg Annual Action Plan	Town of Hamburg	Goals of the Strategic Plan relate to previous years efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2023 Town of Hamburg Consolidated Annual Performan	Town of Hamburg	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Hamburg.
Town of Hamburg Comprehensive Plan - 2022	Town of Hamburg	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Hamburg.

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
2017 Erie County Broadband Feasibility Study	Erie County	The Strategic Plan advances the recommendations of the broadband study.
ErieNET Business Plan Preliminary Draft (2022)	Erie County	The Strategic Plan advances the recommendations of the business plan.
FY2023 Homelessness Summary Brief	Homeless Alliance of Western New York	The Strategic Plan's homelessness strategy was developed consistent with the data presented within.

**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 Hamburg and the Erie County Consortium continue their collaborative efforts and partnerships with state and local government entities to ensure the complete implementation of the Consolidated Plan. Cooperation and coordination with other public entities is important as many of the initiatives that will be implemented, such as homelessness prevention and economic development initiatives, are regional in scope by nature.

**Narrative**

The Town of Hamburg continues to strive to include community agencies in the development and planning process for the Consolidated Plan and Action Plan implementation. The County has on-going efforts to increase coordination and consultation efforts in its planning processes.

## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The development of the Erie County Urban Consortium / Town of Hamburg 2025-2029 Consolidated Plan involved a variety of public outreach activities designed to gather public input and comment regarding implementation of CDBG, HOME and ESG Programs. The citizen participation process allowed the Town an opportunity to better inform the public of the purposes of these programs, the funding allocation process, and to be better aware of the needs of low-and moderate-income citizens.

In June 2024 staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation. More than 250 individual and organizational stakeholders were invited to participate in seven stakeholder meetings involving: Planning and Zoning and Municipal Officials, Public Housing Authorities, Community-based Organizations (CBOs) and Community Housing Development Organizations (CHDOs), Affordable and Special Needs Housing Organizations, Homeless Assistance Providers, Regional Agencies, Health and Human Services Agencies, Lead-Based Paint Agencies, Business Associations, Persons with Disability Advocacy Organizations, Persons with Limited English Proficiency Advocacy Organizations, Fair Housing Organizations, Non-profit Housing Owners, For-profit Housing Owners, Property Managers, Broadband Agencies, Resilience and Emergency Management Agencies, and Real Estate Developers.

The Town of Hamburg Department of Community Development held four public hearings which allowed for public comments and questions about Town programs. The Town'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 has laid out a Citizen Participation Plan (CPP) to broaden citizen participation.

The formal public comment period on the Draft 2025-2029 Consolidated Plan extended from January 10 to February 10, 2025. A public hearing was held on January 22, 2025 to accept comments on the draft. The hearings were advertised in the Buffalo News and also posted on the Town of Hamburg Community Development's website.

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. See the Citizen Participation Appendix for all sign-in sheets, meeting summaries, comment sheets, and summary of community needs survey. Comments received were a part of the Needs Assessment and Market Analysis, and ultimately helped shape the outcome of the Plan's Five-Year Goals and Objectives.

#### 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	Stakeholder Meeting	Regional Agencies and Economic Development	A stakeholder meeting was held on June 25, 2024 at 10:00 am at the Delavan Grider Community Center. Representatives of nine agencies attended.	Infrastructure is aging and in need of updates. Public transportation and internet access are a concern in rural communities. Lack of new starter homes, not profitable enough to build. Need more public/private partnerships.	All comments were accepted.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Stakeholder Meeting	Homelessness and Special Needs Housing	A stakeholder meeting was held on June 25, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 26 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing capacity. Strengthen supportive services. Address regulatory issues that prevent shelters and affordable housing from being built.	All comments were accepted.	
3	Stakeholder Meeting	CHDOs and CBDOs	A stakeholder meeting was held on June 26, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Enhance community engagement. Encourage banks to be more supportive and flexible in their housing loan qualification process. Improve homebuyer training. Explore modular housing to address need for affordable and efficient housing solutions. Assess the financial impact of the 2027 electric mandate.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Stakeholder Meeting	Health and Human Services	A stakeholder meeting was held on June 26, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing in general as well as for DV victims. Address language barriers. Increase services for school age children. Increase funding to nonprofits. Address transportation needs.	All comments were accepted.	
5	Stakeholder Meeting	Housing Authorities, Developers, and Property Owners/Managers	A stakeholder meeting was held on June 27, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Increase shelter capacity. Develop transition programs. Enhance homebuyer education. Address affordable housing. Improve public housing sustainability. Strengthen supportive services. Monitor rental market. Enhance maintenance and security. Focus on needs of rural communities.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Stakeholder Meeting	Advocacy and Fair Housing Organizations	A stakeholder meeting was held on June 27, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Increase education programs on fair housing laws. Increase enforcement of fair housing laws. Address affordable housing.	All comments were accepted.	
7	Stakeholder Meeting	Resilience and Emergency Management	A stakeholder meeting was held on June 28, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of three agencies attended.	Weatherization programs and emergency roof repair programs becoming increasingly important in response to weather volatility Need to continually support and grow warming and cooling stationsCoordination of agencies is imperativeInvest in improved connectivity through broadband investment	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Minorities  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Four (4) public hearings were conducted.	The Town of Hamburg held four public hearings pertaining to the 2025 Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. All public hearings were held at 6122 South Park Avenue, offices of Hamburg Community Development. Public hearings were held on the following dates/times: Monday, September 16, 2024 - 7:00 p.m. One person attended the public hearing to listen to the two presentations about the CDBG and HOME programs. The presentations were provided by Erie County Department of Environment and Planning and The Town of Hamburg Department of Community Development. A local television station attended the public hearing and completed a news story that night on the hearing/event. No e-mail requests were received for this hearing period. Monday, September 23, 2024 - 7:00 p.m. No one attended the public hearing. Four e-mail requests were received. All four e-mails pertained to requests for child care micro-enterprise assistance for WeeCare, Inc. dba as Upwards. (As a	All comments were accepted.	

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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)
9	Newspaper Ad	All community residents	Notice of availability of the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan for public review and comment was published in the Buffalo News on January 10, 2025.	No comments were received		
10	Internet Outreach	All community residents	The FY 2025-FY 2029 Consolidated Plan and FY 2025 Annual Action Plan were posted on the Town's website on January 10, 2025.	No comments were received		

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)
11	Public Hearing	Minorities  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	Hamburg held a public hearing on January 22, 2025 to present and obtain comments on the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan.	No comments were received		

Table 4– Citizen Participation Outreach

## Needs Assessment

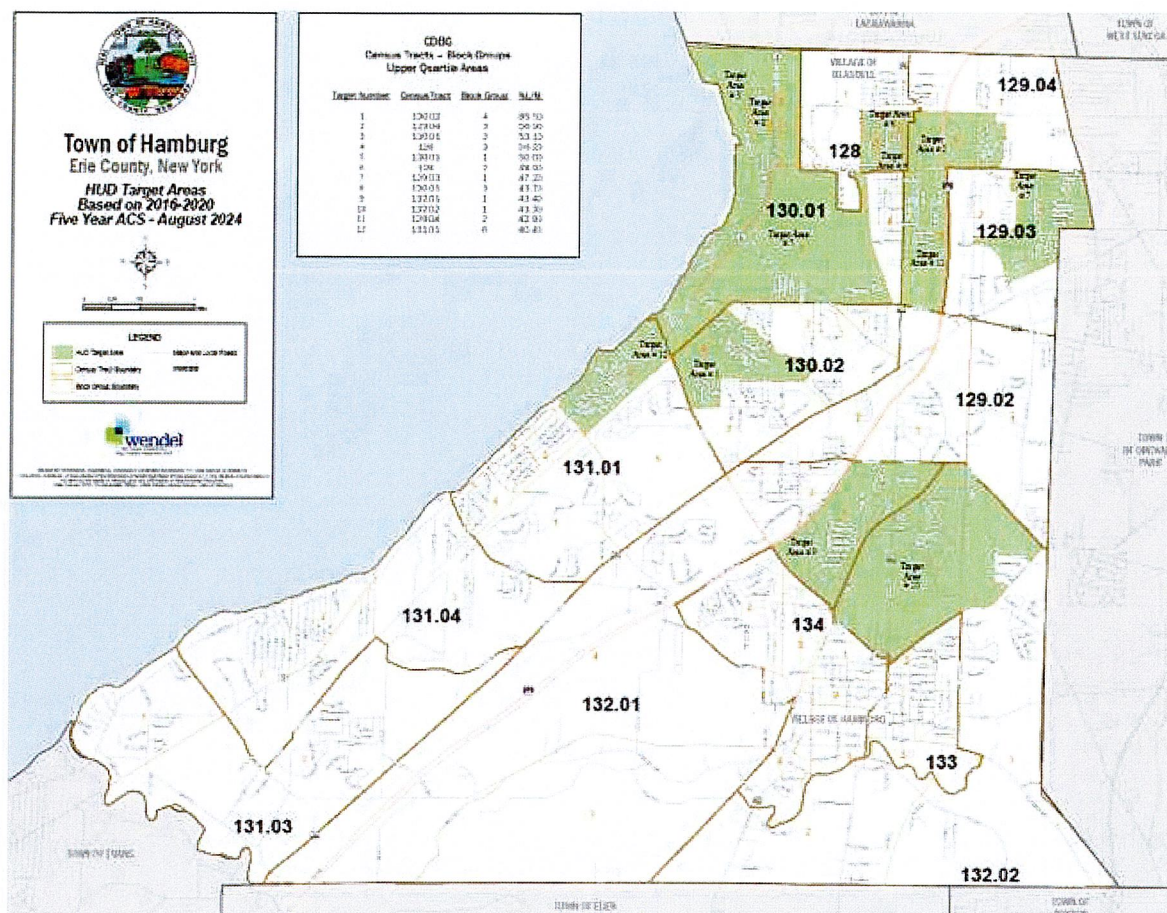
### NA-05 Overview

#### Needs Assessment Overview

The Town of Hamburg is a HUD entitlement community and a member of the Erie County HOME Consortium of which the Erie County is the lead grantee. Since the Town is an entitlement grantee and receives funding independent of the County, a separate Needs Assessment and NA-50 Non-Housing Community Development Needs are presented as specific to the Town of Hamburg.

The needs assessment is based on an analysis of housing problems 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 (2016-2020), which is a special tabulation of American Community Survey (ACS) data from the Census Bureau, as well as 2016-2020 ACS data updated in August 2024. CPD Maps were created to show the geographic distribution and concentration of cost burdened households based on the most recent CHAS data. The map of Hamburg shows Census tracts by number. Areas shaded in green shows designated Community Development target areas within selected Census tracts. There has been significant movement in terms of eligible block groups and resultant target areas from the last Consolidated Plan (further defined in SA-10 Geographic Priorities) and the following map reflects the most recent data. There is better distribution of eligible target areas than in recent years, however most of the target areas are still located in the northern part of the town, along the border with Lackawanna and including the older Village of Blasdell as reflected in the HUD Target Area Map on the following page.



Map Town of Hamburg Target Areas

## Cost Burden Text

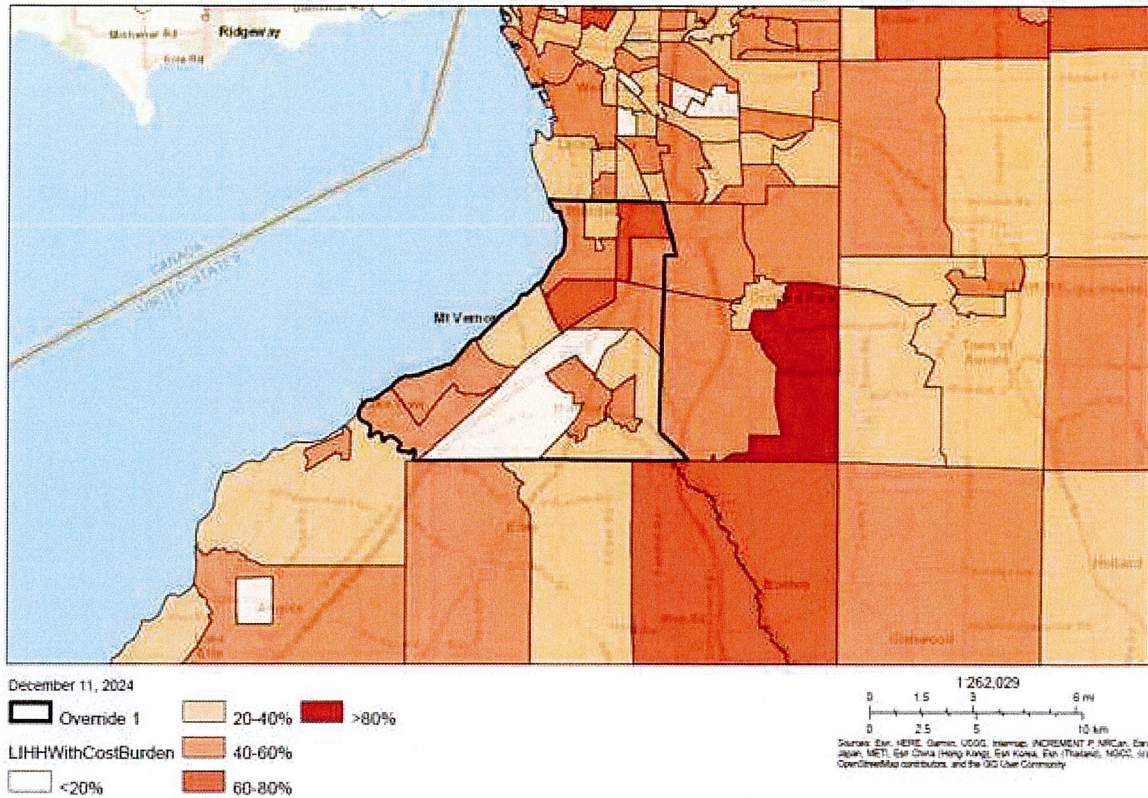
Cost burden is categorized by “HUD Adjusted Median Family Income”, or HAMFI, which refers to the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs. HUD defines housing cost burden as paying more than 30% of household income for housing. As cited under MA-05 Market overview, 42.9% of all renters in the Town of Hamburg have a housing cost which is equal to 30 % of more of their income. For homeowners, up approximately 2.5% from 2019 which is unsurprising and actually reasonable in this regional housing market. The following map shows the largest concentrations of cost burdened households in Hamburg are in Census tracts 128 and 130.01 both of which contain HUD Community Development target areas.







Town of Hamburg - % of LI Households with Severe Cost Burden



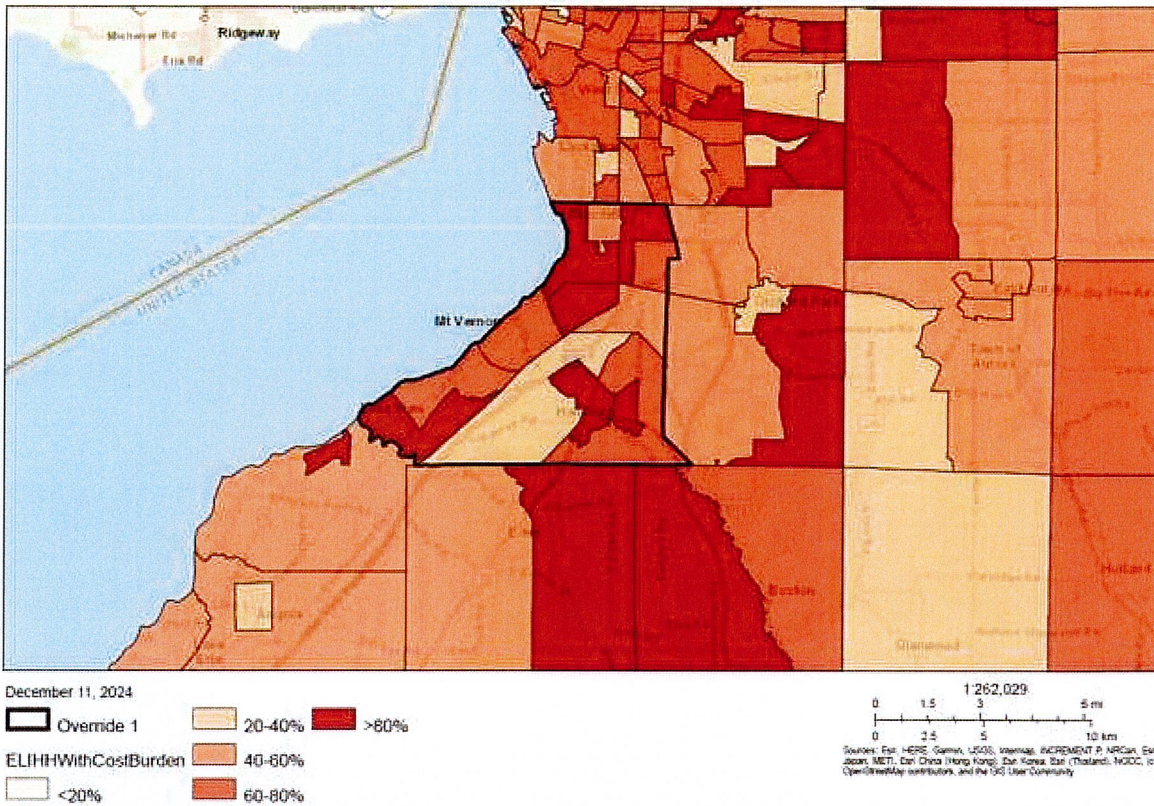
Map Town of Hamburg % of LI Households with Severe Cost Burden

#### ELI Households with Severe Cost Burden

The map below shows the percent of extremely low-income households, those having a housing cost in excess of 50% of income, tracts with severe cost burden, which means having an income below 30% of the median income. It is important to note that when looking at extremely low income, the severe cost burden is much more widely disbursed throughout the Town. This stands to reason, while underscoring the fact that extremely low income individuals reside throughout the Town and impact almost every neighborhood in the Town and the region.



Town of Hamburg - % of ELI Households with Severe Cost Burden

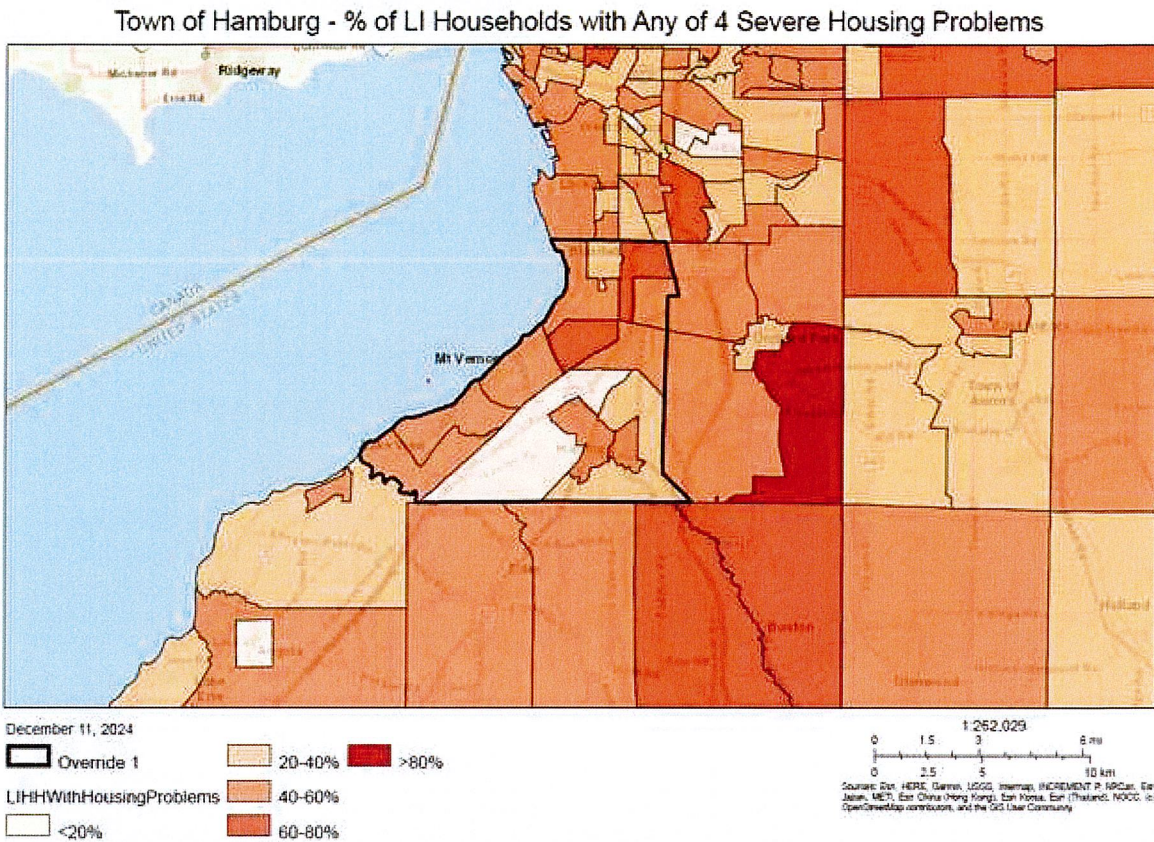


Map Town of Hamburg % of ELI Households with Severe Cost Burden

#### LI Households with Any of 4 Severe Housing Problems

The percent of low-income households, those with an income below 80% of the median, with any of four severe housing problems (lacks complete plumbing, lacks complete kitchen facilities, severe overcrowding and housing cost in excess of 50% of income) is shown in the map below. The largest concentration is Census tracts 128, 130.01, and 130.02. This remains consistent with expectations in the Village of Blasdell and the northern portion of the Town, adjacent to Lackawanna, one of the lowest income municipalities in the Erie County Consortium.



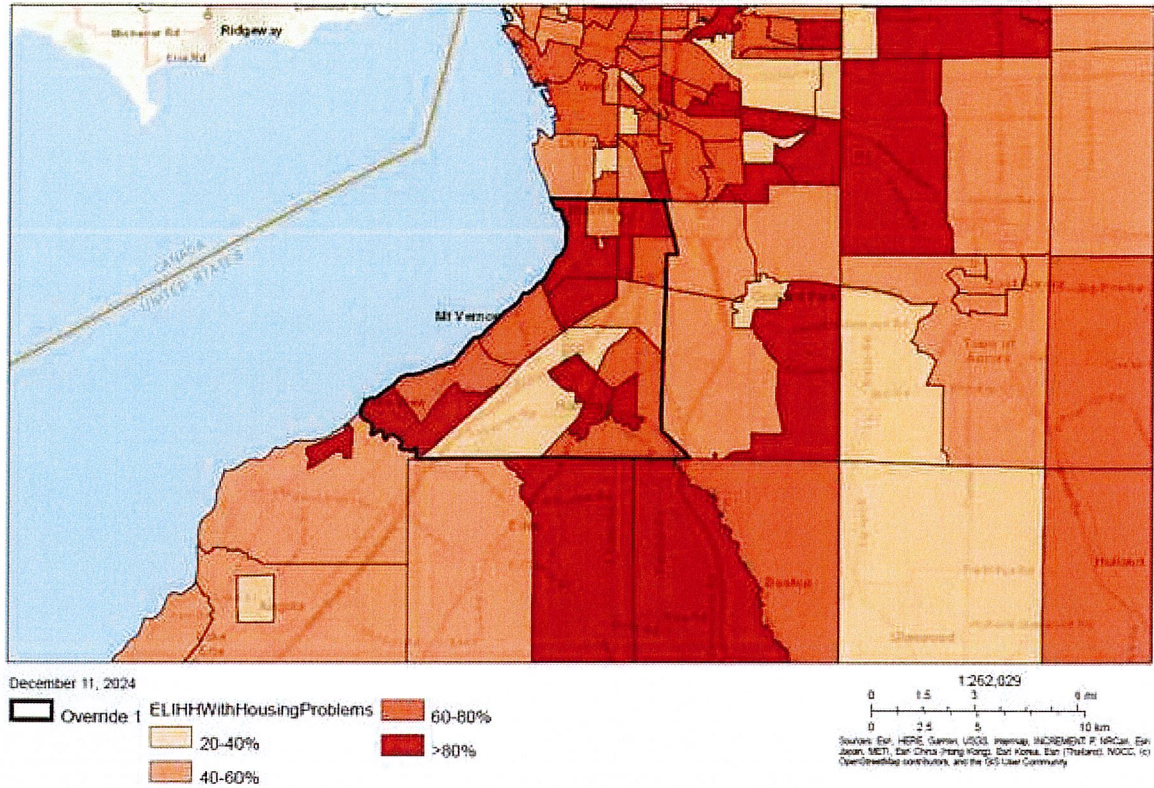


**Map Town of Hamburg % of LI Households with any 4 Severe Housing Problems**

#### **ELI Households with Any of 4 Severe Housing Problems**

The percent of extremely low-income households, those with an income below 50% of the median, with any of four severe housing problems (lacks complete plumbing, lacks complete kitchen facilities, severe overcrowding and housing cost in excess of 30% of income) is shown in the map below. It is important to note that when looking at extremely low income, the severe cost burden is much more widely disbursed throughout the Town. This stands to reason, while underscoring the fact that extremely low-income individuals reside throughout the Town and impact almost every neighborhood in the Town and the region.

Town of Hamburg - % of ELI Households with Any of 4 Severe Housing Problems



Map Town of Hamburg % of ELI Households with any 4 Severe Housing Problems

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**



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

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

The Town of Hamburg is focusing largely on housing, public services, infrastructure and economic development but has made public facility improvements that may include handicapped accessibility improvements and other enhancements and may continue to do so.

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

The market and community need for housing assistance, homelessness prevention, infrastructure improvements and provision of services to Town residents are priorities and there is not enough federal money to adequately invest in those needs. COVID-19 was a large factor in reinforcing these priorities.

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

During the 2025-2029 Consolidated Plan period, the Town of Hamburg and the Villages of Blasdell and Hamburg will continue to target and expend funds for infrastructure projects. Such projects are expected to include waterlines, street repaving, drainage improvements and other types of infrastructure improvements. In 2023 Hamburg completed major road reconstruction in the Villages and were able to benefit 5,900 low and moderate income residents.

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

The Town of Hamburg's Public Works Department evaluates the condition of the Town's infrastructure and recommends needed improvements. The Villages of Blasdell and Hamburg also identify needed infrastructure improvements in a similar manner as they did for the 2023 projects. The Town Board has the final say on specific projects, but all three municipalities also receive requests from citizens for public improvements via public meetings and letters and all proposed projects go through a public process.

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

COVID-19 only increased the need to provide public services to the residents of Hamburg. The Town of Hamburg partners with providers such as:

- Belmont Housing Resources for WNY
- Center for Elder Law & Justice
- Housing Opportunities Made Equal

- St. Peter & Paul Parish Outreach & Food Pantry
- Neighborhood Legal Services, Inc.
- Hamburg Development Corporation
- Western New York Law Center

*Services provided include* legal and eviction prevention services to combat the addition of new members to the homeless population; budget, credit and debt counseling; foreclosure prevention counseling and services; Fair Housing counseling and landlord/tenant counseling; assistance to victims of domestic violence; senior services; and loans to for-profit businesses for job creation and/or retention purposes.

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

These needs were identified by the Town of Hamburg's desire to continue established public services and the increasing need to keep residents from being displaced from their living arrangements wherever possible, to create employment opportunities in close proximity to residents, and to combat poverty by assisting with many of the basic goods and services there are getting harder to afford.

### **Based on the needs analysis above, describe the State's needs in Colonias**



# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

As a member of the Erie County HOME Consortium, the Town of Hamburg is not required to submit a separate housing market analysis as a component of the five-year Consolidated Plan. This document supplements the Consolidated Plan by providing an overview of the Hamburg information that will assist the Town in its local planning efforts during the next five years.

The Town of Hamburg's population as of 2023 is estimated at 59,986 by the American Community Survey and this figure has remained incredibly consistent over the last two decades. The population age 65 and over comprises 21.2% of the population so the needs of seniors are an important factor in community planning and municipal services.

Review of year-built data shows that the Town of Hamburg was a typical post-World War II suburb with its largest growth taking place in the late 1940's and the 1950's. Moderate growth occurred during each subsequent decade. Based on ACS data, the number of occupied units in the Town of Hamburg as of 2022 is 26,144. Owner occupied units totaled 19,171, representing 73.3% of the occupied units. There were 6,973 rental units, 26.7% of the occupied units.

Single family detached structures dominate the owner-occupied housing supply. Nearly nine out of every ten owner occupied units are single detached units. Multifamily structures containing 5 or more units predominates the rental supply. 52.7% of the number of rental units are in structures of five or more units up from 44% since 2015. Another 31.7% were in structures with 2 to 4 units and 13.6% were in single family detached and attached structures.

Vacancy data available indicates overall rental supply is in balance as of the time of the report. The estimated 245 vacant units represents 3.5% of the rental inventory in what is a very tight regional and national rental market. Housing for sale represent less than one-half percent of the owner-occupied inventory.

Based on 2022 ACS data, Median contract rent was \$926 (up a significant 36% from 2015 data) and median gross rent was up 30% at \$1,007

ACS data indicates that median value of homes in Hamburg in 2022 was \$216,900, up a staggering 49%. Costs have only increased in recent years, as have interest rates and the costs associated with financing housing, so these numbers likely do not fully reflect the rapid increase in housing costs in the Town.

Median household income for Hamburg is \$78,794, a 32% increase from 2015. According to the household income table, 30.6% of the households have an income below \$50,000. 28.6% have an income between \$50,000 and \$99,999.

The overall picture in the Town of Hamburg is one of increasing incomes, but even more rapidly increasing costs of housing. The disparity is not nearly as significant as many communities in the region, yet it does increase potential costs burdens associated with housing.

The Town of Hamburg currently has just over 800 units of assisted housing, including approximately 600 senior units and while there has been some talk of a short-term moratorium on housing development, the community is seeing quite a bit of activity bringing new affordable and senior housing on-line to meet this growing demand. The HOME Consortium has supported the development of Oakwood Senior Apartments that opened in 2022 and included seven set-aside units for seniors and frail elderly as well as the Juniper Apartment project that recently broke ground and will bring 65 new affordable apartments to market. Additionally, Riley Brook is a new development located near the town senior center and Frontier School buildings that is bringing 70 new income-eligible one, two, and three – bedroom units on-line.

<b>Year Built</b>	<b>Owner</b>	<b>Renter</b>
2020 or later	0	16
2010-2019	1,180	917
2000-2009	1,742	255
1980-1999	3,741	1,255
1960-1979	4,189	2,352
1940-1959	5,430	937
1939 or earlier	2,889	1,241
<b>Total</b>	<b>19,171</b>	<b>6,973</b>

**Table 5 – Housing Supply**

*Source: 2022 ACS Five Year Estimates*

**Table 5 Housing Supply**

Category	Owner		Renter	
1-detached	17,151	89.5%	790	11.3%
1-attached	622	3.2%	161	2.3%
2 apartments	617	3.2%	1,416	20.3%
3 or 4 apartments	100	0.5%	818	11.7%
5 to 9 apartments	0	0.0%	1,689	24.2%
10 or more apartments	20	0.1%	1,988	28.5%
Mobile Home, RV	661	3.4%	111	1.6%
<b>Total</b>	<b>19,171</b>	<b>100.00%</b>	<b>6,973</b>	<b>100.00%</b>

**Table 6 – Number of Units in Structure**

Source: 2022 ACS Five Year Estimates

**Table 6 Housing Units in Structure**

	Units
For rent	245
Rented, not occupied	96
For sale only	109
Sold, not occupied	58
For seasonal, recreational, or occasional use	299
For migrant workers	0
Other vacant	169
<b>Total</b>	<b>976</b>

**Table 7 – Vacant Units**

Source: 2022 ACS Five Year Estimates

**Table 7 Vacant Units**

Rent Range	Contract Rent		Gross Rent	
Less than \$500	809	12.0%	646	9.6%
\$500-999	3,369	50.1%	2,669	39.7%
\$1,000-1,499	2,227	33.1%	2,823	42.0%
\$1,500-1,999	264	3.9%	501	7.4%
\$2,000-2,499	56	0.8%	72	1.1%
\$2,500-2,999	0	0.0%	14	0.2%
\$3,000 or more	0	0.0%	0	0.0%
<b>Total</b>	<b>6,725</b>	<b>100.00%</b>	<b>6,725</b>	<b>100.00%</b>
Median rent	\$926		\$1,007	

**Table 8 – Contract and Gross Rent**

Source: 2022 ACS Five Year Estimates

**Table 8 Contract and Gross Rent**

Range of owner-occupied unit value	Number	Percent
Less than \$50,000	892	4.7%
\$50,000-99,999	821	4.3%
\$100,000-149,999	2,445	12.8%
\$150,000-199,999	4,251	22.2%
\$200,000-299,999	6,358	33.2%
\$300,000-499,999	3,853	20.1%
\$500,000-999,999	407	2.1%
\$1,000,000 or more	144	0.8%
<b>Total</b>	<b>19,171</b>	<b>100.00%</b>
Median value	\$216,900	

**Table 9 – Value of Owner-Occupied Units**

*Source: 2022 ACS Five Year Estimates*

**Table 9 Value of Owner Occupied Units**

Income Range	Percent
Under \$10,000	3.1%
\$10,000-14,999	3.0%
\$15,000-\$24,999	5.7%
\$25,000-\$34,999	7.6%
\$35,000-49,999	11.2%
\$50,000-\$74,999	17.0%
\$75,000-99,999	11.6%
\$100,000-149,999	20.5%
\$150,000-199,999	12.5%
\$200,000 or more	7.8%
<b>Total</b>	<b>100</b>
Household median income	\$78,794

**Table 10 – Income for Households in Hamburg**

*Source: 2022 ACS Five Year Estimates*

**Table 10 Household Income**

### **Cost Burden and Condition of Housing**

The gross rent to income table reflects cost burden data. A total of 42.9% of renters pay 30% or more of their income for rent. Moreover, within that category 37.4% of renter household pay 35% or more of their income for rent (up 5% from 2017). As shown previously, the median contract rent in Hamburg is estimated at \$926 and the gross rent is rent is \$1,007.

For homeowners without a mortgage, 12.8% have a housing cost which is 30% or more of income. For homeowners with a mortgage, 26.6% have a housing cost which is 30% or more of income.

When the number of homeowners with a mortgage and those without a mortgage are combined, a total of 3,020 households or 15.8% of all homeowners have a housing cost which is equal to 30% of more of their income.

There is clearly a significant, albeit common disparity between the cost burden on renters in the Town verses the cost burden on homeowners. Public policy should take this into account when looking at housing insecurity.

There are 8,247 households living alone and these households represent 31.5% of all households living in Hamburg. Of the 4,119 elderly households living alone, 57.1% are female. It is likely that a significant proportion of these households are among those households who are cost burdened and have a housing cost which is 30% of more of their income, whether as renters or homeowners.

	Number	Percent
Less than 15.0%	1,071	16.1%
15.0 to 19.9%	915	13.7%
20.0 to 24.9%	1,019	15.3%
25.0 to 29.9%	792	11.9%
30.0 to 34.9%	369	5.5%
35.0% or more	2,494	37.4%
<b>Total</b>	<b>6,660</b>	<b>100.0%</b>

**Table 11 – Gross Rent as Percentage of Income**

*Source: 2022 ACS Five Year Estimates*

**Table 11 Gross Rent as percentage of Income**

	With Mortgage		Without Mortgage	
Percent of Income	Number	Percent	Number	Percent
Less than 10.0%	1,027	13.4%	3,272	42.7%
10.0 to 14.9%	2,894	37.7%	1,455	19.0%
15.0 to 19.9%	3052	39.8%	797	10.4%
20.0 to 24.9%	1353	17.6%	734	9.6%
25.0 to 29.9%	1059	13.8%	430	5.6%
30.0 to 34.9%	500	6.5%	205	2.7%
35.0 to 39.9%	427	5.6%	238	3.1%
40.0 to 49.9%	386	5.0%	210	2.7%
50.0% or more	725	9.5%	329	4.3%
<b>Total</b>	<b>11,423</b>	<b>100.00%</b>	<b>7,670</b>	<b>100.00%</b>

**Table 12 – Housing Costs for Owners without Mortgage**

*Source: 2022 ACS Five Year Estimates*

**Table 12 Housing Costs for Owners without Mortgage**

	<b>Total</b>		<b>Male</b>		<b>Female</b>	
Households living alone - nonelderly	4,128	50.1%	1,856	62.9%	2,272	42.9%
Households living alone - 65+	4,119	49.9%	1094	37.1%	3,025	57.1%
<b>Households living alone - total</b>	<b>8,247</b>	<b>100.0%</b>	<b>2,950</b>	<b>100.0%</b>	<b>5,297</b>	<b>100.0%</b>

**Table 13 – Households Living Alone**

*Source: 2022 ACS Five Year Estimates*

**Table 13 Households Living Alone**

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OMB Control No: 2506-0117 (exp. 09/30/2021)

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

### Introduction

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

### Economic Development Market Analysis

As of 2024, economic indicators suggest that the Town of Hamburg is performing slightly ahead of Erie County as a whole, New York State, and the nation. The unemployment rate has steadily stayed below 4% in recent years and the educational attainment of Hamburg's workforce outpaces the region. Hamburg has also experienced a growth in the total number of jobs. The number of jobs reflected in the table below (22,600) represents an increase of almost 20% over the number of jobs in the Town reflected in the 2011-2015 ACS. As shown in the table below, significant job growth was also seen in the Professional, Scientific, Management Services, Retail Trade, and the Other Services category.

A 2022 update to the Town's Comprehensive Plan spoke to protecting the diverse economic base that includes a variety of retail, commercial and industrial offerings and note the Town's economic base also benefits from industrial uses, including the Ford Stamping Plant, the Lake Erie Commerce Park, and Ravenwood North Industrial Park. Other assets that were highlighted as supporting economic activity include the Hamburg Fairgrounds and Gaming on South Park Avenue and the Town's waterfront/tourism resources along the Lake Erie shoreline.

The Hamburg Development Companies, which include the Hamburg Development Corporation and the Hamburg Industrial Development Agency, have an overall mission to stimulate economic development within the Town of Hamburg. These entities market the Town to potential businesses, companies, and investors and currently have multiple projects underway supporting the Town's economic development.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	0	0	0	0	0

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Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Arts, Entertainment, Accommodations	0	0	0	0	0
Construction	0	0	0	0	0
Education and Health Care Services	0	0	0	0	0
Finance, Insurance, and Real Estate	0	0	0	0	0
Information	0	0	0	0	0
Manufacturing	0	0	0	0	0
Other Services	0	0	0	0	0
Professional, Scientific, Management Services	0	0	0	0	0
Public Administration	0	0	0	0	0
Retail Trade	0	0	0	0	0
Transportation and Warehousing	0	0	0	0	0
Wholesale Trade	0	0	0	0	0
Total	0	0	--	--	--

Table 5 - Business Activity

Data Source Comments:

Business by Sector	# Workers	# Jobs	% Workers	% Jobs	Jobs Less Workers %
Agriculture, Mining, Oil & Gas Extraction	167	67	1%	0%	0%
Arts, Entertainment, Accommodations	2,708	3,492	9%	15%	7%
Construction	1,608	768	5%	3%	-2%
Education and Health Care Services	8,365	4,116	27%	18%	-9%
Finance, Insurance, and Real Estate	2,797	551	9%	2%	-7%
Information	498	127	2%	1%	-1%
Manufacturing	2,915	1,734	10%	8%	-2%
Other Services	1,028	1,009	3%	4%	1%
Professional, Scientific, Management Services	2,387	2,288	8%	10%	2%
Public Administration	1,663	857	5%	4%	-2%
Retail Trade	3,692	6,152	12%	27%	15%
Transportation and Warehousing	1,845	851	6%	4%	-2%
Wholesale Trade	913	588	3%	3%	0%
<b>Total</b>	<b>30,586</b>	<b>22,600</b>			

Table 14 – Business Activity

Source: 2022 ACS 5 Year Estimates (workers), 2022 Longitudinal Employer-Household Dynamics (All Jobs)

Table 14 Business Activity

## Labor Force

Total Population in the Civilian Labor Force	0
Civilian Employed Population 16 years and over	0
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

Table 6 - Labor Force

Data Source Comments:

<b>Labor Force</b>	
Total Population in the Civilian Labor Force	32,094
Civilian Employed Population 16 years and over	30,586
Unemployment Rate	4.5%
Unemployment Rate for Ages 16 to 19	11.2%
Unemployment Rate for Ages 20 to 24	4.2%
Unemployment Rate for Ages 25 to 29	7.9%
Unemployment Rate for Ages 30 to 34	30.0%
Unemployment Rate for Ages 35 to 44	3.9%
Unemployment Rate for Ages 45 to 54	3.4%
Unemployment Rate for Ages 55 to 59	7.0%
Unemployment Rate for Ages 60 to 64	4.0%
Unemployment Rate for Ages 65 to 74	5.4%
Unemployment Rate for Ages 75 and over	3.4%

**Table 15 – Labor Force – Unemployment by Age**

Source: 2022 ACS 5 Year Estimates

**Table 15 Labor Force**

<b>Occupations by Sector</b>		<b>Number of People</b>
Management, business and financial	0	
Farming, fisheries and forestry occupations	0	
Service	0	
Sales and office	0	
Construction, extraction, maintenance and repair	0	
Production, transportation and material moving	0	

**Table 7 – Occupations by Sector**

Data Source Comments:

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	0	0%
30-59 Minutes	0	0%
60 or More Minutes	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>

Table 8 - Travel Time

Data Source Comments:

Travel Time	Number	Percentage
< 30 Minutes	312,473	76.2%
30-59 Minutes	81,604	19.9%
60 or More Minutes	15,993	3.9%
<b>Total</b>	<b>410,070</b>	<b>100%</b>

Table 16 -- Travel Time to Work

Source: 2022 ACS 5 Year Estimates

## Table 16 Travel Time to Work

## Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	0	0	0
High school graduate (includes equivalency)	0	0	0
Some college or Associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

Table 9 - Educational Attainment by Employment Status

Data Source Comments:

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Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	348	68	584
High school graduate (includes equivalency)	4,890	319	1,577
Some college or Associate's degree	8,786	403	1,633
Bachelor's degree or higher	10,632	283	1,345

**Table 17 – Educational Attainment by Employment**

*Source: 2022 ACS 5 Year Estimates*

#### Table 17 Educational Attainment by Employment

#### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

**Table 10 - Educational Attainment by Age**

Data Source Comments:

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	36	160	73	143	172
9th to 12th grade, no diploma	242	166	97	343	806
High school graduate, GED, or alternative	1,005	1,250	1,342	4,030	3,941
Some college, no degree	1,919	1,270	1,329	3,323	1,985
Associate's degree	280	1,190	800	2,926	2,131
Bachelor's degree	534	1,863	2,046	3,837	1,918
Graduate or professional degree	142	956	1,323	2,590	1,771

**Table 18 – Educational Attainment by Age**

*Source: 2022 ACS 5 Year Estimates*

**Table 18 Education Attainment by Age**

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 11 – Median Earnings in the Past 12 Months**

Data Source Comments:

Median Earnings in the Past 12 Months	
Educational Attainment	2022 Inflation Adjusted Dollars
Less than high school graduate	40,638
High school graduate (includes equivalency)	35,207
Some college or Associate's degree	45,745
Bachelor's degree	61,821
Graduate or professional degree	71,621

**Table 19 – Educational Attainment by Median Earnings**

*Source: 2022 ACS 5 Year Estimates*

**Table 19 Educational Attainment by Median Earnings**

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

The Retail sector employs the largest number of workers at 27%, followed by Education and Health Care Services at 18%, Arts, Entertainment, Accommodations at 15%, and Professional, Scientific, Management Services at 10%.

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

Since the data available for the last Consolidated Plan, the Town of Hamburg has seen a 17.5% increase in those who have had at least some college as part of their educational attainment. This combines with an increase in the Town in available jobs within many of the professional industries that require some college for a high percentage of their positions. These coinciding trends may help explain why travel time to work is decreasing overall for the Town of Hamburg workforce.

That said there is clearly a movement away from manufacturing jobs in Hamburg and Erie County and there is a high risk of displaced workers who will need skills training or additional educational attainment to find work within the growing industries. A report by Erie Community College found that the most significant workforce needs in the region relate to the aging population, the need for workers to remain current with ever-changing technology, and the skills gap that results from a mismatch between educational programs and workforce needs.

Again, travel time has decreased overall for Hamburg residents, however stakeholders said that there is a large regional problem with transportation systems that is creating a disconnect between low income workers and employment opportunities.

**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.**

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

There exists a disconnect between the skills possessed by job seekers and those required for many of the available employment opportunities. Stakeholders pointed specifically to trends toward advanced manufacturing creating a skills gap for both older employees and job seekers and new entrants to the labor pool. New and ongoing public and private investments in advanced manufacturing, energy-related fields, and the technology sector are anticipated to only widen that gap.

**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.**

Workforce Buffalo is a network of employment training providers, educational institutions, economic development agencies, and community services organizations that work together to provide career and workforce assistance. This network includes the Buffalo and Erie County Workforce Investment Board (WIB). The ACT Consortium participates in the workforce development and training initiatives sponsored by the WIB.

Workforce Buffalo includes Career Centers that provide basic career services for all job seekers, with a priority of career and training services given to low-income individuals, those who are basic skills deficient (including English language learners) and to veterans and eligible spouses. The main career center is located at the SUNY-Erie Community College (ECC) North Campus located in the Town of Amherst. The one-stop career center provides assistance with job searches, resume preparation, interviews, job training needs, promotion and career transition. A satellite career center is located at ECC's South Campus in Orchard Park. Workforce Buffalo's other Career Center is the Buffalo Employment Training Center which provides services for workers, job seekers, and businesses, including specialized programming for veterans, young adults (16+), and recently incarcerated individuals.



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

The Northland Workforce Training Center, located in Buffalo, provides training to help workers capitalize on new economic opportunities in the advanced manufacturing and technical fields. Other agencies providing employment and workforce development programs to Erie County residents include: ACCES-VR (individuals with disabilities), the Adult Education Division of the Buffalo Public Schools, and Center of Employment Opportunities (recently incarcerated individuals).

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

Yes

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

In 2021, the Erie County Industrial Development Agency (ECIDA) finalized a five-year update of its CEDS for 2022-2026. The CEDS encompasses all of Erie County. Given that it was developed amid the COVID-19 pandemic, the CEDS includes planning for economic recovery and long-term resilience. The CEDS includes an action plan built around four goal areas: Infrastructure, Business Support, Quality of Life and Regional Collaboration and also recognizes the interdependence of economic development and community development. As attraction and retention of a qualified workforce become increasingly important to economic development, considerations such as housing, poverty, childcare, transportation and recreation (all traditionally falling within the purview of “community” development) have become important considerations in economic development strategies. Specific goals contained in the CEDS that align with the Consolidated Plan are: expand access to broadband internet services; ensure access and opportunity for a diverse workforce; provide safe, affordable housing for all residents and families; and provide access to affordable childcare.

**Discussion**

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## **MA-50 Needs and Market Analysis Discussion**

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

The greatest concentration of low-income households is found within Census tract 130.01, ranging between 40-55%. There are concentrations of low income households ranging from 25-40% in Census Tract 129.04 and 128.

The highest level of poverty is shown in Census tracts with between 10% and 18% of households meeting the poverty criteria. Census tracts having this degree of poverty concentration are 128, 129.01, 129.03, and 130.1. As can be viewed on the numbered Census tract map for the Town, designated Community Development target areas are within all of these Census tracts.

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

The Analysis of Impediments to Fair Housing Choice (2024) identified one census tract with significant concentrations of both poverty and minority populations. More specifically, these Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), are defined as areas where the non-white fraction of the population is more than double the overall non-white fraction of the population in the community and where the local poverty rate (census tract) is more than twice as large as the community poverty rate.

The census tract is located adjacent to multiple R/ECAPs in neighboring Lackawanna. Since the 2009- 13 ACS, the data from which are used by HUD in its AFFTH0004a dataset, the non-White share of population in this tract increased 3.4% and the poverty rate has stayed stable.

Notably, whereas the northwesternmost census tract in Hamburg was identified as a R/ECAP in the prior Analysis of Impediments to Fair Housing Choice process, patterns of population change since 2010 have coincided with racially/ethnically concentrated poverty shifting just to the east, where both Asian and Hispanic/Latinx residents live in disproportionate numbers relative to each group's share of Hamburg's overall population.

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

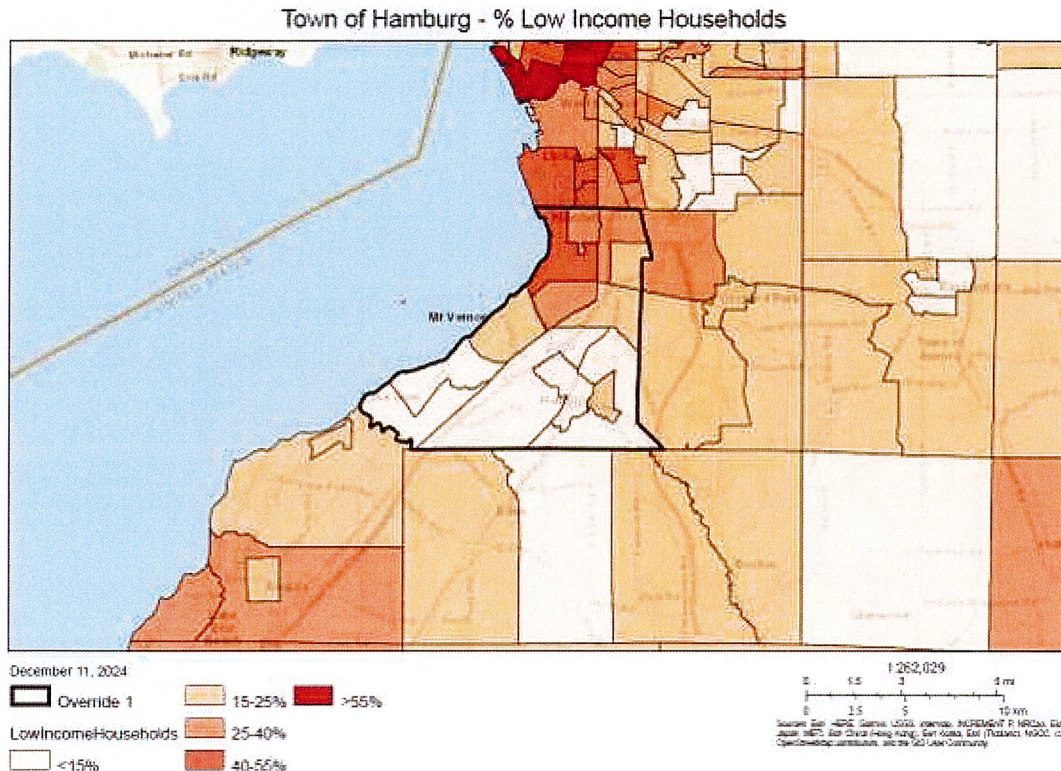
There are a number of older, early suburban developments in close proximity to the City of Lackawanna. The Village of Blasdell features commercial corridors and concentrated activity. As noted I the Needs Assessment, this area features the highest percentage of housing problem and has been an area of focus for rehabilitation activities.

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

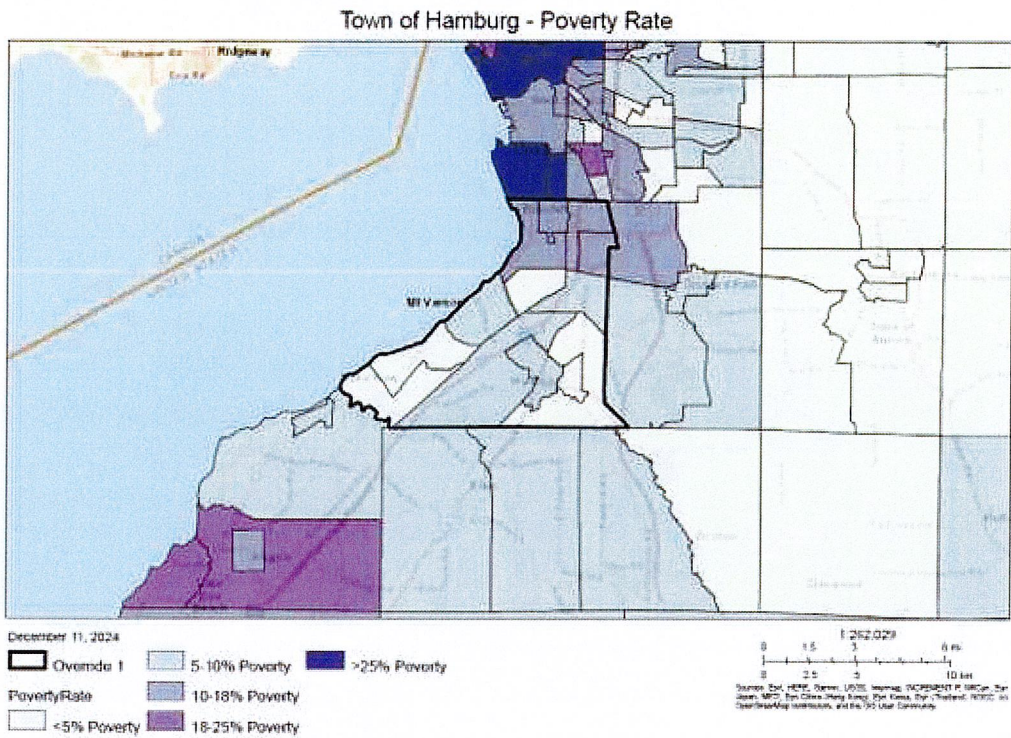
These areas contain a solid housing stock in need of repair. There are small business districts that provide basic services and employment opportunities to area residents.

### Are there other strategic opportunities in any of these areas?

There are opportunities to revitalize these areas for mixed-use development and reinvestment in the older areas that have sufficient infrastructure to serve an influx of new homebuyers and commercial and retail activity. This is further supported by the proximity to Lackawanna and the City of Buffalo.



**Map Town of Hamburg LI Households**



Map Town of Hamburg Poverty Rate

Tract ID	Population	% Non-White	Poverty Rate
129.041	3,738	12.3%	14.4%

**Table20 – Town of Hamburg, Racially or Ethnically Concentrated Areas of Poverty**  
*Analysis of Impediments to Fair Housing Choice (2024)*

Table 20 Town of Hamburg RECAPs





## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

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

There is a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, but these providers either do not target residential or small business, or price their fiber optic services such that they are prohibitively expensive to residential users or small business. The Erie County Broadband Committee has specifically identified “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” as a significant need.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

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

Verizon and Spectrum service levels vary, depending upon the infrastructure and services available in different parts of the County. The study found that while the urban and suburban areas of the County are for the most part served in terms of access and competition, many of the rural areas of the County, which are towns and villages to the south and east, are lacking and expected to fall further behind.

The 2017 Study identified a lack of essential infrastructure in the form of competitive choices of fiber optic service provider(s) to city, town, and village neighborhoods within the Consortium, other than Verizon FiOS™. While there was a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, the providers either did not target residential or small business, or priced their fiber optic services such that they were prohibitively expensive to residential users or small business.

To meet the goal of “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” one path was the creation of an Open Access Network (OAN) that would be available to public and private organizations and would improve broadband service throughout the Consortium. The creation of the OAN views broadband infrastructure as a utility necessary to maintain quality of life and keep communities competitive. While the development of the OAN was the most aggressive proposal in the 2017 Study, the availability of funding under the American Rescue Plan Act (ARPA) made the OAN a viable option for providing broadband service. In 2021, Erie County commissioned ECC Technologies, Inc. (ECC) to develop an OAN Business Plan, including a preliminary route design for a middle-mile fiber optic backbone interconnecting cities, towns and villages throughout the County. In 2022, ErieNet Local Development Corporation (ErieNet), a not-for-profit local development corporation, was formed to develop and operate the OAN, which is to be comprised of 400 miles of fiber optic backbone comprised of headend and regional points of presence, interconnections to public and private broadband providers, aerial and buried cable pathways, fiber optic cabling and components, and community anchor institutions (CAI’s) endpoints. Examples of CAI’s include County facilities, 911 centers, libraries, municipal facilities, school district facilities, higher education institutions, healthcare facilities, and other major employers. The dark fiber provided by ErieNet can be used by CAI’s for their own network communications and applications and also by telecommunications carriers, Internet Service Providers and other public and private broadband providers to extend and connect their infrastructure to their constituents and customers. Construction and launch of the OAN is being funded with \$34 million in ARPA funds and an additional \$2.8 million in County funding for design and construction management services. Installation has begun and is expected to be completed in mid-2025.



## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

In March 2023, along with the University of Buffalo, the County published the Erie County Climate Vulnerability Assessment in funded in part by the Climate Smart Community Grant Program, Title 15 of the Environmental Protection Fund through the NYS Department of Environmental Conservation.

The plan analyzed the County's exposure and vulnerability to changing climate conditions, including but limited to:

- Increased temperatures and more heat waves
- Enhanced intensity of both floods and drought
- Longer growing seasons, but changes in what is able to be effectively grown
- More variability in lake levels and increased shoreline erosion
- Warmer lake temperatures that exacerbate algal blooms, leading to polluted water
- Amplified threats to human health (e.g., reduced air quality, risk of disease-carrying insects, and extreme temperatures)

Ultimately the plan assessed the potential effects of hazards and the County's specific sensitivity to extreme heat, flooding, high winds, biological hazards, and limitations related to mobility and accessibility in order to gauge the County's preparedness for natural hazards and to develop an action plan for hazard mitigation, hazard preparation, hazard response, and hazard recovery.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

Erie County is committed to anticipating and mitigating to whatever extent possible, the vulnerability of housing occupied by low- and moderate-income households to increased natural hazards associated with climate change. In 2020 Erie County established the Climate Action Fund, that reinvests half of the cost savings achieved through energy conservation and waste reduction into sustainability initiatives.

The County has committed to utilize the Climate Action Fund to invest in "Opportunities" identified in the Climate Action and Sustainability Plan to directly respond to identified "Threats" and "Vulnerabilities"

Additionally, the County has partnered with the New York State Energy Research and Development Authority to develop the Erie County Low-Income Program for Sustainable Energy (ECLIPSE). ECLIPSE is intended to create a community-scale program to provide integrated energy services for Low- to Moderate-Income (LMI) households by purchasing energy in bulk for as many as 60,000 Home Energy

Assistance Program (HEAP) recipients in Erie County. An interdepartmental county team will work with partners, such as utilities and community organizations, to develop strategies to recruit LMI households into this bulk purchasing program.

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The Town of Hamburg continues to prioritize public facility improvements for infrastructure projects where eligible. The Town of Hamburg has shifted away from making loans for housing rehabilitation programs and is now only lending for rehabilitation as part of the Mobile Home Renovation Loan Program. This shift from loans to grants through the Housing Renovation Program is reflective of the high priority the Town is putting on maintaining quality housing and housing stability for low- and moderate-income residents.

Public services have become an even larger priority after the COVID-19 pandemic. The Town of Hamburg will continue to utilize partners like Belmont Housing Services of WNY, Housing Opportunities Made Equal (HOME), the Center for Elder Law & Justice, Neighborhood Legal Services, and Sts. Peter and Paul Outreach (remove the following - the Homeless Alliance of Western New York (HAWNY), and the Legal Aid Bureau) to provide public services to the residents of the Town.

The Town continues to foster economic development through a partnership with the Hamburg Development Corporation (HDC) to provide financial assistance to businesses creating job opportunities for low and moderate income residents.

#### Institutional Delivery Structure

The Town of Hamburg Department of Community Development administers CDBG and HOME funds via the Erie County HOME Consortium provided to the Town by 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 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.

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

### Geographic Area

Table 12 - Geographic Priority Areas

1	Area Name:	Town of Hamburg Exception Target Area #1
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg CT130.02 BG 4. rail tracks to the west, Howard Road, the Creek to the northwest.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
2	Are there barriers to improvement in this target area?	No.
	Area Name:	Town of Hamburg Exception Target Area #2
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	

	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Lake Avenue to the north; Milestrip Road to the south; Bethford Drive to the east; east boundary of the Village of Blasdel to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical single family and two-family housing in this area. Nonindustrial commercial businesses in this area.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
3	<b>Area Name:</b>	Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #3
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Lackawanna border to north; Camp Road to the south; Route 5 to the east; Lake Erie to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception Criteria Target Area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.

	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
4	<b>Area Name:</b>	Village of Blasdell Exception Target Area #4
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Village of Blasdell. Miller Avenue to the north; south boundary of the Village to the south; east boundary of the Village and South Park Ave to the east; Martin Ave to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception Criteria Target Area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
5	<b>Area Name:</b>	Town of Hamburg Exception Target Area #5
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	

	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Milestrip Road to the north; Big Tree Road to the south; a rail line to the east; and Route 5 on the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
6	<b>Area Name:</b>	Village of Blasdell Exception Target Area #6
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Village of Blasdell. Lake Avenue to the north; Miller Avenue to the south; east boundary of Census Tract 128 (just east of South Park Avenue) to the east; Martin Street to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical housing and non-industrial commercial.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.

	<b>Are there barriers to improvement in this target area?</b>	No.
<b>7</b>	<b>Area Name:</b>	Town of Hamburg Exception Target Area #7
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Milestrip to the North; Sheldon Road to the South; Town of Orchard Park to the East; Brompton Drive to the West.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical single family and two-family housing in this area. Nonindustrial commercial businesses in this area.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
<b>Are there barriers to improvement in this target area?</b>	No.	
<b>8</b>	<b>Area Name:</b>	Town of Hamburg Exception Target Area #8
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	



	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. First Street to the North; Seventh Street and Nelson Avenue to the South; Route 5 and Milestrip Road to the East; Woodlawn Avenue to the West.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical housing in this area. Commercial characteristics of this area nonindustrial.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
9	<b>Area Name:</b>	Town of Hamburg Exception Target Area #9
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Sowles Road to the north; Camp Road to the south; rail line to the east; New York State Thruway to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.

	<b>Are there barriers to improvement in this target area?</b>	No.
10	<b>Area Name:</b>	Town of Hamburg Exception Target Area #10
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Sowles and Bayview Roads to the north; Legion Drive to the south; Maelou Drive to the west; Clark Street to the east.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
11	<b>Area Name:</b>	Town of Hamburg Exception Target Area #11
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Milestrip Road on the north; Big Tree Road on the south; the New York State Thruway on the east; South Park Avenue on the west.

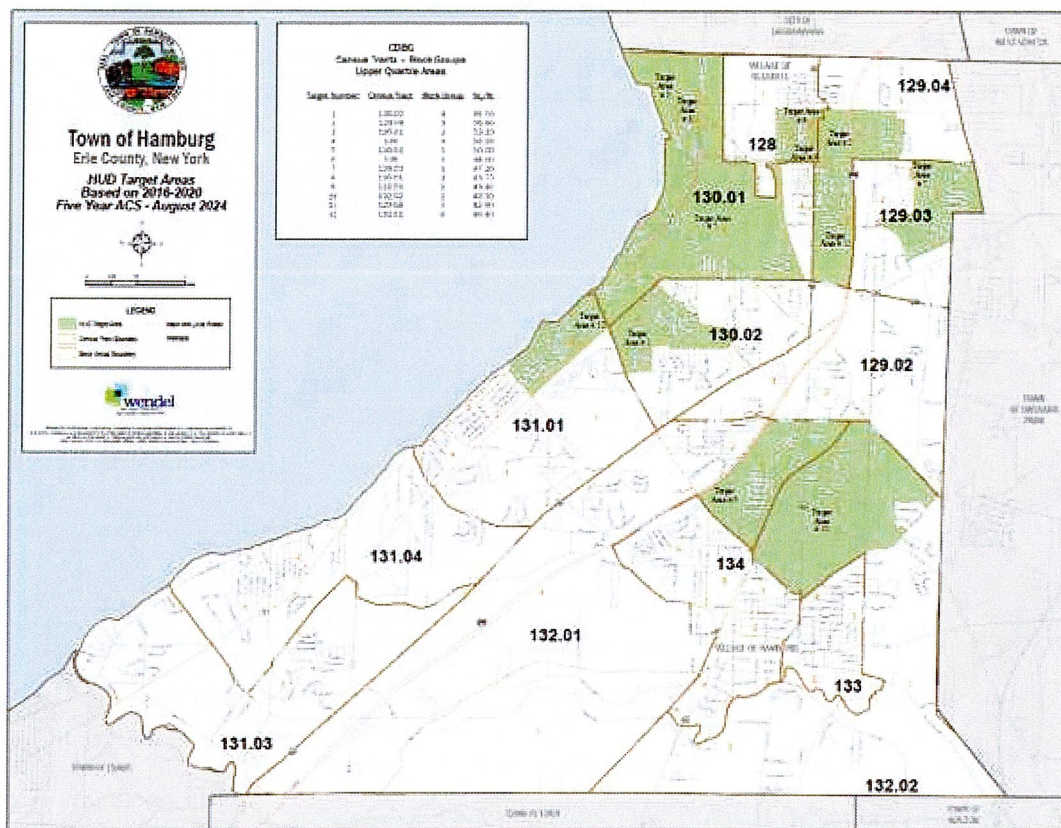
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
<b>12</b>	<b>Area Name:</b>	Town of Hamburg Exception Target Area # 12
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Town of Hamburg. Camp Road to the north; Rogers Road to the south; the rail tracks to the east; Lake Erie to the west.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Typical Housing in this area and non-industrial commercial businesses.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Exception criteria target area.
	<b>Identify the needs in this target area.</b>	Housing rehabilitation and infrastructure improvements.
	<b>What are the opportunities for improvement in this target area?</b>	Housing rehabilitation and infrastructure improvements.
	<b>Are there barriers to improvement in this target area?</b>	No.
<b>13</b>	<b>Area Name:</b>	Town Wide
	<b>Area Type:</b>	Local Target area

<b>Other Target Area Description:</b>	
<b>HUD Approval Date:</b>	
<b>% of Low/ Mod:</b>	
<b>Revital Type:</b>	Housing
<b>Other Revital Description:</b>	
<b>Identify the neighborhood boundaries for this target area.</b>	Lake Erie to the west. The City of Lackawanna to the north. The Town of Orchard Park to the East. The towns of Evans, Boston, and Eden to the South
<b>Include specific housing and commercial characteristics of this target area.</b>	Older 1800's to new homes, villages of Hamburg and Blasdell with higher density, and commercial areas off of Interstate 90.
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
<b>Identify the needs in this target area.</b>	Housing rehabilitation to stabilize the neighborhood and continue sustainability, Infrastructure improvements and public facilities.
<b>What are the opportunities for improvement in this target area?</b>	Neighborhood sustainability and preservation.
<b>Are there barriers to improvement in this target area?</b>	Older properties, increasing housing instability, proximity to Lackawanna (different demographic characteristics).

### General Allocation Priorities

Describe the basis for allocating investments geographically within the state

With 12 target areas and a relatively modest allocation of federal resources, the Town of Hamburg focuses much of the direct investment of CDBG and HOME funding into the target areas based on their specific need. A high percentage of the housing rehabilitation and infrastructure funding is therefore allocated to activities within the Village of Blasdell.



Hamburg Target Area Map

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

### Priority Needs

Table 13 – Priority Needs Summary

1	<b>Priority Need Name</b>	Public Facilities and Infrastructure Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Public Facilities and Infrastructure Improvements
	<b>Description</b>	Infrastructure and facility improvements in the Town of Hamburg and the Village of Blasdell. Such projects may include waterlines, street repaving, drainage improvements and other types of infrastructure improvements within HUD eligible target areas, including projects such as Hamburg Highway Dept. and Martin Avenue
	<b>Basis for Relative Priority</b>	Improving and maintaining the public infrastructure continues to be a high priority. There is an ongoing need to address inadequate streets and sidewalks in poor surface condition, crumbling curbs in need of replacement and redesign to facilitate mobility for a cross-section of residents' as well as a need to address inadequate drainage and aging water infrastructure.
2	<b>Priority Need Name</b>	Improve Housing Stock
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Improve Housing Stock - Renovation

	<b>Description</b>	Housing renovation continues to be in high demand in Hamburg. The older housing stock, particularly in early suburban developments, requires ongoing maintenance and up-keep to maintain decent living conditions. In addition to grants for eligible homeowners, the Town sees a need for resources to assist with mobile home repairs and provides 2% loans for that purpose.
	<b>Basis for Relative Priority</b>	The older housing stock in the community requires ongoing housing rehabilitation. The popularity of the program shows the ongoing need and high demand for housing rehabilitation.
3	<b>Priority Need Name</b>	Public Services and Fair Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Fair Housing Public Services
	<b>Description</b>	<p>The Town has contracted with Housing Opportunities Made Equal (HOME), a Fair Housing Counseling and Enforcement Agency, to provide fair housing and landlord/tenant counseling. Budget, credit, debt, and foreclosure counseling are provided in conjunction with Belmont Housing Resources for WNY.</p> <p>The Town of Hamburg works to prevent homelessness by partnering with wit Elder Law &amp; Justice and Neighborhood Legal Services for eviction protection services and counseling.</p>
	<b>Basis for Relative Priority</b>	<p>Public services continue to be a high priority in Hamburg, even more so in the wake of COVID-19.</p> <p>Additionally, cost burdening is an issue for Town residents, both homeowners and renters, creating financial stress in the housing market and the need for support services. The Town also has a significant number of housing developments available to low-and-moderate-income households and larger multifamily structures (5 units or more) predominate the rental supply, generating the potential for fair housing concerns.</p>
4	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High

	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Economic Development
	<b>Description</b>	The Department of Community Development has jurisdiction and reporting duties over the Town's economic development loan program. The economic development loans are part of the Town's Community Development Block Grant funding and portfolio. Currently, the Town of Hamburg has an Agreement with the Hamburg Development Corporation (HDC) to administer its economic development program. The "HDC" is a direct sub-recipient of the Town of Hamburg and its Community Development Block Grant (CDBG) funding.
	<b>Basis for Relative Priority</b>	The difficulty of owning and operating a business, especially a small business, has only increased since the pandemic. Supply chain interruptions, interest rate increases, and general economic uncertainty create a situation where additional capital is often necessary and incentives can help businesses survive and/or grow.
5	<b>Priority Need Name</b>	Homeless Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Rural Chronic Homelessness Individuals
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Homeless Prevention Program
	<b>Description</b>	The Town of Hamburg works to prevent homelessness by partnering with wit Elder Law & Justice and Neighborhood Legal Services for eviction protection services and counseling.
	<b>Basis for Relative Priority</b>	Housing shortages in the region and increased cost burdens related to housing have increased the number of households who are at-risk of becoming homeless.



## Narrative (Optional)

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

### Introduction

The Town of Hamburg's highest priorities for PY 2025 include infrastructure/street improvements, housing rehabilitation, homeownership assistance, comprehensive fair housing services, housing counseling (budget, credit, debt, and foreclosure assistance, eviction/legal services, homeless prevention and economic development as priority projects. Geographically, the Town of Hamburg focuses its CDBG funds in its HUD defined Low and Moderate Income target areas based upon the American Community Survey (ACS) update (August, 2024). The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, usually expending its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	445,160	100,000	0	545,160	2,000,000	All figures are based upon current CDBG program estimates and are subject to change via the federal budget process.

Table 14 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Village of Blasdell utilizes their own funds to add to their CDBG projects. This amount vary from year to year based upon municipal budgets. The Town of Hamburg also provides credit in the form of building permits and fees to act as a match for HOME funds through the Consortium with Erie County.

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

**Discussion**

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

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Belmont Housing Resources for WNY, Inc.	Non-profit organizations	Ownership Rental	Region
Center for Elder Law and Justice	Non-profit organizations	public services	Region
HOUSING OPPORTUNITIES MADE EQUAL, INC.	Non-profit organizations	Rental	Region
Saints Peter and Paul Parish Outreach and Food Pantry	Non-profit organizations	public services	Jurisdiction
Neighborhood Legal Services	Non-profit organizations	public facilities	Region
Hamburg Development Corp.	Non-profit organizations	public services	Jurisdiction

Table 15 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

#### Strengths

The Hamburg Community Development Department is an effective point of contact for the programming put forth in the Consolidated Plan. The Department works with non-profit partners to deliver public services ranging from eviction prevention and fair housing, to budget, credit and debt counseling. The Department can cross-reference programs and services in order to match residents with multiple programs including the Town's direct rehabilitation program and homeless prevention program when applicable.

#### Gaps

The major gap that exists relates to CHDOs. The existing CHDOs have had difficulty satisfying the HUD requirements regarding development experience and organizational capacity. This has created a shortage of CHDOs within the Consortium area. This may require establishing new CHDOs or expanding the reference point/priority of existing ones.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X		
<b>Other</b>			

**Table 16 - Homeless Prevention Services Summary**

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

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

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

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

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

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

Other Street Outreach Services - The Department of Social Services has contracted Crisis Services to serve homeless individuals in need of emergency shelter when DSS-Emergency Housing is closed.

Alcohol & Drug Abuse – The Erie County Department of Alcohol and Substance Abuse administers drug and alcohol prevention programs while detoxification services for alcohol and substance abuse are available through Erie County Medical Center, Buffalo General Hospital, Alcohol and Drug Dependency Services

Child Care - The Day Care Unit provides integral referrals and information to all families, service providers, community-based organizations and divisions with the Erie County Department of Social Services. Referrals are provided to clients after determining the most effective level of services available.

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

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

Healthcare - The Erie County Health Department's Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies. The Community Health Center also does medical assessments of low-income individuals in the community.

HIV/AIDS - The Planned Parenthood of Buffalo and Erie County Mobile Outreach Unit screens clients for sexually transmitted diseases and other medical needs.

Life Skills - The CASH coalition (Creating Assets Savings and Hope) continues to operate two "Hope Centers" that provide onsite access to financial management counselors, benefits counselors, and help with filing for the earned income tax credit.

Financial management intervention, counseling services, advice on budgeting and financial problems, and other life skills programming are provided through: Consumer Credit Counseling Service of Buffalo, Catholic Charities, Business and Professional Women of Buffalo, and Cornell Cooperative Extension.

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

For Special Needs Populations there is a Single Port of Entry process throughout the Continuum of Care region. Specific to Hamburg, the Town refers its residents to programs to combat homelessness such as the eviction prevention and counseling services provided by Neighborhood Legal Services and the Center for Elder Law & Justice.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The Town of Hamburg works closely with appropriate local agencies within the Continuum of Care

The plan highlights the need for wider awareness and use of mainstream resources and existing community services. It advocates educating consumers, service providers, and the local community to empower people to better access the benefits and services for which they or their clients are eligible.

The Continuum of Care Alignment section includes six goals that aim to improve the homeless service system throughout the CoC service area. The goals range from developing and codifying systematic approaches for addressing obstacles and meeting gaps to improving data collection and performance measurement efforts.

The Town addresses situations where families or individuals may slip through the cracks in the service delivery system by working with Belmont Housing to identify any extreme, emergency homeless situations, and making provision for payment to a hotel or motel for a period of time until a longer-term solution can be reached.

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

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Infrastructure Improvements	2025	2029	Non-Housing Community Development		Public Facilities and Infrastructure Improvements	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted  Other: 10 Other
2	Improve Housing Stock - Renovation	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$820,160	Homeowner Housing Rehabilitated: 40 Household Housing Unit
3	Improve Housing Stock - Homeownership Assistance	2025	2029	Affordable Housing			CDBG: \$200,000	Direct Financial Assistance to Homebuyers: 10 Households Assisted
4	Fair Housing	2025	2029	Affordable Housing		Public Services and Fair Housing	CDBG: \$50,000	Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
5	Public Services	2025	2029	Non-Housing Community Development		Public Services and Fair Housing	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Economic Development	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$375,000	Jobs created/retained: 12 Jobs
7	Homeless Prevention Program	2025	2029	Homeless		Homeless Assistance	CDBG: \$100,000	Homelessness Prevention: 40 Persons Assisted

Table 17 – Goals Summary

#### Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	Public infrastructure improvements, including milling/paving of streets within designated HUD target areas will be a priority for the Town as well as public facility improvements within said target areas.
2	Goal Name	Improve Housing Stock - Renovation
	Goal Description	The Town of Hamburg provides grant funding for low- and moderate-income clients through the Housing Renovation Grant program and the Mobile Home Renovation Loan Program (2% loan up to \$7,500).
3	Goal Name	Improve Housing Stock - Homeownership Assistance
	Goal Description	The Town of Hamburg provides first time homebuyer grants up to \$20,000 for the purchase of an existing home within the Town and its Villages
4	Goal Name	Fair Housing
	Goal Description	Fair Housing counseling and landlord/tenant counseling will be provided in conjunction with Housing Opportunities Made Equal (HOME).

5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	The Town contracts with service providers including Bemont Housing Resources to provide budget, credit and debt counseling, as well as foreclosure prevention counseling and services. The Town also contracts with The Center for Elder Law and Justice for housing, legal, and eviction services.
6	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Funds issued as loans to for-profit businesses for job creation and/or retention purposes. An estimated \$75,000 in revolving Loan Funds (RLF) is anticipated for use in PY 2025 (or \$375,000 over the next five years from 2025-2029).
7	<b>Goal Name</b>	Homeless Prevention Program
	<b>Goal Description</b>	The Town of Hamburg works with the Center for Elder Law & Justice and Neighborhood Legal Services to provide legal and eviction prevention services to combat the addition of new members to the homeless population. The Town further supports homeless individuals staying in local hotels with assistance to food pantry and outreach services.

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

The Town of Hamburg estimates the following assistance based on the identified program:

- 1) Housing Rehabilitation (CDBG): An estimated 8 households will be assisted via the Housing Rehabilitation Program annually. This program is targeted towards low- and moderate- income households (80% and lower of MHI)
- 2) Housing Renovation Grants (HOME): An estimated five households will be assisted via the Housing Renovation Grant Program annually. This program is targeted towards low- income households (50% and lower of MHI).



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

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

The Town of Hamburg Community Development Department provides educational materials to the community and to applicants for housing -based programs that provide information on the danger of lead paint hazards and ways to minimize risk associated with them. Homeowners are advised of the availability of testing for elevated levels of lead in the blood of children.

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

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

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

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

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

The Town of Hamburg takes a comprehensive look at combatting poverty through education and counseling, the provision of affordable housing and opportunities for homeownership, housing rehabilitation programs to keep people housed and housed in quality residential units, supporting economic development and job creation in the town, and by creating partnerships to provide goods and services to residents in need. Specifically, the Town:

- Implements a first-time homebuyer to provide opportunities for homeownership without the high initial cost burden that can lead to 'house poverty'
- Provides rehabilitation assistance for rental properties, owner-occupied, and mobile homes in order to lessen cost the burden of maintaining a residence and helping maintain quality living standards
- Partners to provide budget, debt, and credit counseling as well as legal services to prevent eviction and foreclosure
- Supports the Hamburg Development Corporation's loan program that funds businesses creating new job opportunities for low- and moderate-income individuals
- Supports the efforts of St. Peter & Paul Parish Outreach who has a contract with Feedmore WNY to provide food to those in need - including homeless individuals and families that are living in Town

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

As noted in the Market Analysis, housing prices have increased significantly in the Town of Hamburg, however Hamburg remains affordable in comparison to the regional market and provides stable and affordable residential opportunities in a community with a relatively high quality of life in close proximity to significant economic opportunity and in a community with strong social and municipal services. This is supported by the fact that, for the last two years, sale prices have continued to match or exceed asking prices in Hamburg demonstrating the pressure that lack of supply to meet the demand is putting on housing costs.

The Town is focused on continued efforts to improve the supply of quality affordable houses, while maintaining strong municipal services and strong social services to those in need.

## **SP-80 Monitoring - 91.230**

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

The Town of Hamburg Department of Community Development will continue to monitor its sub-recipient, the Hamburg Development Corporation (HDC), on a bi-annual basis as has been done in the past.

The Hamburg Town Board has directed the Department of Community Development to assist the Hamburg Development Corporation (HDC) with economic development funds through the use of CDBG Program Income funds. To this end, the HDC provides economic development loans that are geared toward job creation and/or job retention. Over the past several years, the Department of Community Development has required the HDC to update its program application and to also update and amend its reporting requirements to be consistent with the regulations for the Community Development Block Grant (CDBG) program. In order to ensure that the HDC was following the proper HUD required regulations, the Department of Community Development completes bi-annual monitoring of the HDC that includes on site reviews of loan files, job creation numbers, evaluation of its program and the effectiveness in which the funds are utilized. Twice a year the Department of Community Development specifically monitors the HDC, its books, files and records to ensure that the CDBG funding provided to the HDC is utilized in a way that is eligible within the regulations for the CDBG program.

With respect to the Town's housing programs, the Town of Hamburg Department of Community Development staff along with the Town of Hamburg Finance Department reviews all housing programs balances, loan pay offs, deposits and expenditures on a monthly basis.

For both Village of Hamburg and Village of Blasdell Infrastructure projects, the Town conducts visits of job sites to complete employee interviews. In addition, the Town reviews payroll for these projects to ensure Davis-Bacon requirements are being followed.

The Town also makes regular updates to its policies and procedures for all of our programs, submits quarterly Federal Financial Transaction Reports, and makes semi-annual submissions of Federal Labor Standards Report and annual submissions of MBE/WBE Contracting-Subcontracting Reports.

In addition to monitoring's conducted by Town personnel, Erie County conducts periodic monitoring's of all HOME-funded projects under Hamburg's Homeowner Rehabilitation program, including: inspection of case files to determine compliance with HOME standards; review of compliance with proper lead testing and remediation procedures; on-site visits; and review of project management (including record-keeping and documentation).

## Expected Resources

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

### Introduction

The Town of Hamburg's highest priorities for PY 2025 include infrastructure/street improvements, housing rehabilitation, homeownership assistance, comprehensive fair housing services, housing counseling (budget, credit, debt, and foreclosure assistance, eviction/legal services, homeless prevention and economic development as priority projects. Geographically, the Town of Hamburg focuses its CDBG funds in its HUD defined Low and Moderate Income target areas based upon the American Community Survey (ACS) update (August, 2024). The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, usually expending its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	445,160.00	100,000.00	0.00	545,160.00	2,000,000.00	All figures are based upon current CDBG program estimates and are subject to change via the federal budget process.

Table 18 - Expected Resources – Priority Table



**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The Village of Blasdell utilizes their own funds to add to their CDBG projects. This amount vary from year to year based upon municipal budgets. The Town of Hamburg also provides credit in the form of building permits and fees to act as a match for HOME funds through the Consortium with Erie County.

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

## **Discussion**

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Infrastructure Improvements	2025	2029	Non-Housing Community Development	Village of Blasdell Exception Target Area #6 Town of Hamburg Exception Target Area #8	Public Facilities and Infrastructure Improvements	CDBG: \$215,160.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
2	Improve Housing Stock - Renovation	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$150,000.00	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Fair Housing	2025	2029	Affordable Housing			CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Public Services	2025	2029	Non-Housing Community Development			CDBG: \$18,750.00	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$70,000.00	Jobs created/retained: 5 Jobs
6	Homeless Prevention Program	2025	2029	Homeless			CDBG: \$30,000.00	Homelessness Prevention: 5 Persons Assisted
7	Improve Housing Stock - Homeownership Assistance	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$80,000.00	Direct Financial Assistance to Homebuyers: 4 Households Assisted

Table 19 – Goals Summary

#### Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	
2	Goal Name	Improve Housing Stock - Renovation
	Goal Description	
3	Goal Name	Fair Housing
	Goal Description	

4	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Under this goal of Public Services, the Town of Hamburg will provide Housing Counseling (Budget, Credit, Debt & Foreclosure Counseling) and Legal/Eviction services for eligible residents.
5	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Funds provided with CDBG Program Income.
6	<b>Goal Name</b>	Homeless Prevention Program
	<b>Goal Description</b>	Funds utilized with CDBG Program Income
7	<b>Goal Name</b>	Improve Housing Stock - Homeownership Assistance
	<b>Goal Description</b>	

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

### Introduction

The Town of Hamburg's priorities for 2025 include infrastructure/street improvements, housing renovations, grants to assist first-time homebuyers, comprehensive fair housing services, public services including housing counseling, legal/eviction and homeless prevention services as its priority projects. Geographically, the Town of Hamburg focuses the majority of CDBG funds in its HUD defined Low and Moderate Income target areas based upon the August, 2024 ACS mapping data. The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, which usually expends its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

#	Project Name
1	Town of Hamburg Infrastructure Reconstruction
2	Blasdell Infrastructure Reconstruction
3	Housing Renovation Grants
4	Homeownership Assistance - First Time Homebuyer
5	Fair Housing Services
6	Housing Counseling
7	Legal/Eviction Services
8	Job Creation

**Table 20 – Project Information**

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

Allocation priorities are based upon past and recent needs combined with the ability to expend CDBG funds in a timely manner. Lack of funding is an obstacle to addressing underserved needs.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Town of Hamburg Infrastructure Reconstruction
	<b>Target Area</b>	Town of Hamburg Exception Target Area #8
	<b>Goals Supported</b>	Public Facilities and Infrastructure Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Improvements
	<b>Funding</b>	CDBG: \$140,160.00
	<b>Description</b>	Use of CDBG funds for public infrastructure in conjunction with the Town of Hamburg Highway Department. L/M target area roads to be identified then milled/repaved.
	<b>Target Date</b>	12/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To be determined: 1) Once funding is formally approved by Congress and passed into law. 2) Roads to be identified within HUD Target Areas with the Highway Department.
	<b>Location Description</b>	Roads to be identified within HUD Target Areas in conjunction with the Hamburg Highway Department. Target Area #8
	<b>Planned Activities</b>	Milling and repaving of roads within HUD Target area(s).
2	<b>Project Name</b>	Blasdell Infrastructure Reconstruction
	<b>Target Area</b>	Village of Blasdell Exception Target Area #4
	<b>Goals Supported</b>	Public Facilities and Infrastructure Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Improvements
	<b>Funding</b>	CDBG: \$75,000.00

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OMB Control No: 2506-0117 (exp. 09/30/2021)

	<b>Description</b>	Use of CDBG funding for public infrastructure in conjunction with the Village of Blasdell Public Works Department. Salisbury Avenue being the targeted street.
	<b>Target Date</b>	12/31/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Dependent upon final funding awarded.
	<b>Location Description</b>	Salisbury Avenue within HUD Targets areas.
	<b>Planned Activities</b>	Public infrastructure improvements in conjunction with the Village of Blasdell Public Works Department on Salisbury Avenue.
3	<b>Project Name</b>	Housing Renovation Grants
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Improve Housing Stock - Renovation
	<b>Needs Addressed</b>	Improve Housing Stock
	<b>Funding</b>	CDBG: \$150,000.00
	<b>Description</b>	Conditional grants to low/moderate income residents for repairs to their owner-occupied dwellings. Roofs, windows, furnaces, electrical, etc.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Eight
	<b>Location Description</b>	To be determined upon individual approvals for qualification.
	<b>Planned Activities</b>	Conditional grants to low/moderate income residents for repairs to their owner-occupied dwellings. Roofs, windows, furnaces, electrical, etc.
4	<b>Project Name</b>	Homeownership Assistance - First Time Homebuyer
	<b>Target Area</b>	Town Wide



	<b>Goals Supported</b>	Improve Housing Stock - Homeownership Assistance
	<b>Needs Addressed</b>	Improve Housing Stock
	<b>Funding</b>	CDBG: \$80,000.00
	<b>Description</b>	Conditional grants to income qualified first time homebuyers. Up to \$20,000 per grant.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Four
	<b>Location Description</b>	Area wide activity based upon income qualification. Townwide, including the Villages of Blasdel and Hamburg.
	<b>Planned Activities</b>	Conditional grants to qualified first time homebuyers.
5	<b>Project Name</b>	Fair Housing Services
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Fair Housing
	<b>Needs Addressed</b>	Public Services and Fair Housing
	<b>Funding</b>	CDBG: \$10,000.00
	<b>Description</b>	Funding for Fair Housing services for town residents via a contract with Housing Opportunities Made Equal.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Fifty
	<b>Location Description</b>	6122 South Park Avenue, Hamburg, NY 14075
	<b>Planned Activities</b>	Fair Housing services for town residents via a contract with Housing Opportunities Made Equal, including monthly hours on site in Hamburg.

6	<b>Project Name</b>	Housing Counseling
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services and Fair Housing
	<b>Funding</b>	CDBG: \$5,000.00
	<b>Description</b>	Housing Counseling services via a contract with Belmont Housing Resources for WNY. Budget, credit, debt, foreclosure, HUD approved first time buyer counseling and homeless services.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Twenty-five
	<b>Location Description</b>	6122 South Park Avenue, Hamburg, NY 14075
	<b>Planned Activities</b>	Housing Counseling services via a contract with Belmont Housing Resources for WNY. Budget, credit, debt, foreclosure, HUD approved first time buyer counseling, and homeless services.
7	<b>Project Name</b>	Legal/Eviction Services
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services and Fair Housing
	<b>Funding</b>	CDBG: \$10,000.00
	<b>Description</b>	Legal and eviction services to eligible residents in an effort to prevent homelessness.
	<b>Target Date</b>	3/31/2026

8	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Twenty
	<b>Location Description</b>	6122 South Park Avenue, Hamburg, NY 14075
	<b>Planned Activities</b>	Legal and eviction services to eligible residents in an effort to prevent homelessness.
	<b>Project Name</b>	Job Creation
	<b>Target Area</b>	Town Wide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$75,000.00
	<b>Description</b>	Job creation for low income clients via loans to for profit businesses.
	<b>Target Date</b>	3/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	5 Jobs created via economic development loans to for profit businesses.
	<b>Location Description</b>	Various throughout the town based upon applications submitted during the PY.
	<b>Planned Activities</b>	Jobs created via economic development loans to for profit businesses.

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

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

As in the past, the Town of Hamburg expends its public facility projects within HUD target areas only. Further projects/services are directed to low/moderate income residents, thus maintaining the 100% low/moderate income expenditures.

### Geographic Distribution

Target Area	Percentage of Funds
Town of Hamburg Exception Target Area #1	
Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #3	
Town of Hamburg Exception Target Area #2	
Village of Blasdell Exception Target Area #4	
Town of Hamburg Exception Target Area # 12	
Town of Hamburg Exception Target Area #5	
Village of Blasdell Exception Target Area #6	
Town of Hamburg Exception Target Area #7	
Town of Hamburg Exception Target Area #8	
Town of Hamburg Exception Target Area #11	
Town of Hamburg Exception Target Area #10	
Town of Hamburg Exception Target Area #9	

Table 21 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Based upon HUD target areas created by the ACS as detailed in August, 2024.

### Discussion

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

### **Introduction**

The Town of Hamburg and its Department of Community Development actively coordinates with agencies, municipalities, housing providers and social service agencies that directly benefit town and village residents. Examples are contracts with Housing Opportunities Made Equal, Inc.; Belmont Housing Resources for WNY; The Center for Elder Law & Justice and also with other agencies such as Neighborhood Legal Services; Sts. Peter & Paul Food Pantry/Outreach. Furthermore we have contacts within Erie County agencies, Rural Outreach Center, and others to assist our residents.

### **Actions planned to address obstacles to meeting underserved needs**

As part of ongoing efforts to address underserved needs, the Town of Hamburg works closely with the Continuum of Care agencies, other municipalities, and other Erie County departments to address said needs.

### **Actions planned to foster and maintain affordable housing**

The Town of Hamburg has been and will continue to be at the forefront of affordable housing in the region. Our work with over 600 families in providing homeownership assistance since 1992 continues to this day. Our housing renovation program continues at a steady rate of performance since we changed the program from loans to conditional grants. Our mobile home repair program continues to assist clients with repairs to the homes with an extremely low loan interest rate of 2%. Specific housing counseling for housing issues also maintains affordable housing in Hamburg.

### **Actions planned to reduce lead-based paint hazards**

Any client/family proceeding through our housing programs will have their home checked for lead and if needed be cleared for lead during their housing process.

### **Actions planned to reduce the number of poverty-level families**

Reducing poverty-level families directly relates to the amount of funding received by the Town of Hamburg via the CDBG entitlement program. Programs addressing food insecurity, rent relief, homelessness and others are being included annually within our annual CDBG projects. Contacts with numerous public service agencies are continued throughout the year to assist in this matter.

### **Actions planned to develop institutional structure**

The Town of Hamburg continues to look for innovative ways to keep and develop its institutional structure for its residents, especially for those low/moderate income residents. Working with not-for-

profits, countywide agencies and other municipalities continues to be effective in this matter.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The Town of Hamburg through its Department of Community Development already coordinates between housing and social service agencies directly benefitting town residents. Examples are contracts with Housing Opportunities Made Equal, Inc.; Belmont Housing Resources for WNY; The Center for Elder Law & Justice along with coordinating with other agencies such as Neighborhood Legal Services; Sts. Peter & Paul Food Pantry/Outreach. Furthermore we have contacts within Erie County agencies, Rural Outreach Center, and others to assist our residents.

### **Discussion**

## Program Specific Requirements

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

#### Introduction

Projects planned with CDBG funds are expected to be available during the year are identified in the Projects Table AP-35 (2025). The following identifies an additional \$100,000 in CDBG program income funding that is estimated to be available for use during the upcoming 2025 program year. Projects to be funded include loans to for-profit businesses for job creation and homeless prevention use via our Homeless Prevention Program.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	100,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>100,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

## **Discussion**

Overall Benefit - A period of three years is utilized to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. This new Consolidated Plan covers the years 2025, 2026 & 2027.



## Attachments

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

B-25-MC-36-0013

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** Town of Hamburg, New York

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

16-6002270

**\* c. UEI:**

RALWE4Z4FRF5

**d. Address:**

**\* Street1:** 6100 South Park Avenue

**Street2:**

**\* City:** Hamburg

**County/Parish:**

**\* State:** NY: New York

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 14075-3766

**e. Organizational Unit:**

**Department Name:**

Community Development

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr

**\* First Name:**

Christopher

**Middle Name:**

**\* Last Name:**

Hull

**Suffix:**

**Title:** Director of Community Development

**Organizational Affiliation:**

**\* Telephone Number:** 716-648-6216

**Fax Number:**

**\* Email:** chull@townofhamburgny.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing & Urban Development

### 11. Assistance Listing Number:

14.216

Assistance Listing Title:

Community Development Block Grant/Entitlement Grants

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Community Development Block Grant 2025 Entitlement Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

23

\* b. Program/Project

23

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

04/01/2025

\* b. End Date:

03/31/2026

**18. Estimated Funding (\$):**

\* a. Federal

445,160.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

100,000.00

\* g. TOTAL

545,160.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mrs.

\* First Name:

Catherine

Middle Name:

A

\* Last Name:

Rybczynski

Suffix:

\* Title:

Supervisor

\* Telephone Number:

716-649-6111 Ext. 2381

Fax Number:

\* Email:

carybczynski@townofhamburgny.gov

\* Signature of Authorized Representative:



\* Date Signed:

5/21/25

**Applicant and Recipient  
Assurances and Certifications**

**U.S. Department of Housing  
and Urban Development**

OMB Number: 2501-0044  
Expiration Date: 02/28/2027

**Instructions for the HUD-424-B Assurances and Certifications**

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

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

**\*Authorized Representative Name:**

Prefix: Mrs. \*First Name: Catherine  
Middle Name: A.  
\*Last Name: Rybczynski  
Suffix:

\*Title: Supervisor

\*Applicant Organization: Town of Hamburg, New York

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

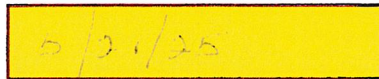
I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

**WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

\*Signature:



\*Date:





## CERTIFICATIONS

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

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

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

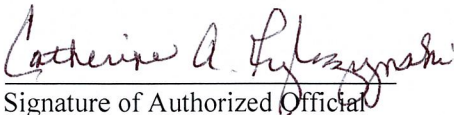
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

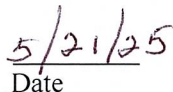
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the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


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

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

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

  
Signature of Authorized Official

  
Date

  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2025, 2026, 2027 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

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

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



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

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

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

Catherine A. Lyszynski  
Signature of Authorized Official

5/21/05  
Date

SUPERVISOR  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

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