

FINAL

**U.S. HUD 5-YEAR
CONSOLIDATED PLAN**

Amherst - Cheektowaga - Tonawanda Consortium

April 1, 2015 to March 31, 2020

Executive Summary

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

1. Introduction

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

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

As HUD entitlement communities, the towns are required to prepare this Five-Year Consolidated Plan (CP) for the aforementioned federal grant programs to guide funding for housing, community development and economic development activities within their communities. This CP covers the period from FY 2015 through FY 2019 (April 1, 2015 to March 31, 2020).

Purpose of the Consolidated Plan

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

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

viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

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Focus of the Plan

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

Structure of the Plan

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

2. Summary of the objectives and outcomes identified in the Plan

The Strategic Plan provides a framework to address the needs of the Town of Tonawanda for the next five years using CDBG, HOME, and ESG 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, HOME, and ESG programs are:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

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

The Town of Tonawanda also uses CDBG funds to create a suitable living environment by funding public services that improve the lives of its low-moderate income residents by providing services to youth and homeless persons.

An annual Action Plan is prepared each year that identifies specific projects and activities that will be carried-out to address the needs identified in the CP. The Town of Tonawanda's 2015 Annual Plan includes the following activities: housing rehabilitation, public services, public facilities, acquisition/demolition, housing counseling, assistance to the homeless and persons with disabilities, homebuyer assistance, weatherization, code enforcement, and economic development. These and other activities are described in more detail throughout this Plan.

3. Evaluation of past performance

The Town of Tonawanda has focused a majority of its limited CDBG resources on housing mainly because of the great need when compared to other community development issues. Also, there are not many government programs for homeowners to repair their homes in such a comprehensive manner. Whereas, there are some economic development programs that provide State and Federal resources for businesses such as through tax incentives from the Erie County Industrial Development Agency(ECIDA) and the federal Small Business Administration(SBA).

Certainly the critical issue of today is focused on providing good paying jobs for the community. The Town began collecting data associated with providing housing repair assistance through the CDBG-R Program and will continue to do so on all CDBG assisted projects for federal reporting in IDIS. It can be shown that this funding is creating or retaining several jobs every year in the construction trades through the Town's housing programs.

The Town has historically met all of its 5-Year Consolidated Plan goals that have been established through the various housing and community development programs that it offers. The challenge will be maintaining the results of these programs in the face of staggering budget cuts including a 26% CDBG cut over the last 3 years and a 46% cut in HOME funding.

4. Summary of citizen participation process and consultation process

The Citizen Participation Plan sets forth the procedures and policies the Towns of Amherst, Cheektowaga, and Tonawanda will use to encourage citizen participation in the development, operation

and reporting of their annual Community Development Block Grants, HOME Investment Partnership Grant, and the Consolidated Plan.

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

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Citizen Participation Process

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

In order to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments, the Towns will publish a summary of the proposed Consolidated and Annual Plan and a notice of availability of the document for public review in the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE and the Metro as a display advertisement at least 30 days prior to its submission to the Department of Housing and Urban Development. Complete copies of the proposed Consolidated and Annual Plans will be available online as well as at all Town libraries, the Amherst Planning Department, the Village Clerks' offices in Depew, Sloan, Kenmore and Williamsville, the Town Clerks' offices, and on the Towns' websites. The summary will describe the contents and purpose of the Consolidated and Annual Plans, and will include a list of the locations where copies of the entire proposed Plans may be examined. In addition, the Towns will provide a copy of the plan to citizen groups that request it and copies on disk to individuals.

Notice of a public hearing to be held during the development of the Annual and Consolidated Plan to invite public comments and inquiries will be placed in the legal sections of the Amherst BEE, the Cheektowaga BEE and the Ken-Ton BEE and the Metro Source at least 10 days prior to the date of the hearing and as a display ad in these papers.

The Town will consider any comments or views of citizens received in writing, or orally at the public hearings, during the preparation of the final Annual and Consolidated Plan. A summary of these

comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Annual and Consolidated Plan.

5. Summary of public comments

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

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

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

7. Summary

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	TONAWANDA	
CDBG Administrator	TONAWANDA	
ESG Administrator	TONAWANDA	

Table 1– Responsible Agencies

Narrative

The Town of Tonawanda Community Development Department is the lead agency for the preparation of the Five-Year Strategic Plan, administration of the CDBG program and administration of the Emergency Solutions Grant Program. The Towns of Cheektowaga and Tonawanda serve as Participating Grantees in the ACT HOME Consortium.

The Town of Tonawanda will receive an ESG entitlement grant directly from HUD in FY 2015.

Consolidated Plan Public Contact Information

The Town of Amherst Community Development Department administers the Amherst HOME Consortium allocation for the three towns of Amherst, Cheektowaga, and Tonawanda. The Town's Community Development Department is responsible for the Consolidated Plan process in collaboration with the towns of Cheektowaga and Tonawanda along with the Erie County Consortium. Inquiries related to this Consolidated Plan can be made to:

James D. Hartz, AICP

Director of Community Development

Town of Tonawanda

169 Sheridan-Parkside Drive

Tonawanda, NY 14150

phone: (716) 871-8847 Ext. 1

email: jhartz@tonawanda.ny.us

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

1. Introduction

FOR THE FULL TEXT OF THIS SECTION SEE AD-25 (ADMINISTRATION), IN ATTACHMENTS: GRANTEE UNIQUE APPENDICES.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

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

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Because homelessness is less concentrated in Tonawanda and the remainder of the ACT Consortium, it is not as noticeable as it is in the nearby City of Buffalo. No homeless shelters are located within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium. The Homeless Alliance of Western New York manages the CoC within the ACT Consortium. The CoC maintains a rapid re-housing program for the five-county Western New York area. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability.

Community development staff in the Consortium's towns have participated in the Prism Project Forum and Point in Time Count to survey the homeless and help to create a data base of services utilized by the chronically homeless. These projects, sponsored by the Homeless Alliance of Western New York, have produced a Ten-Year Action Plan to end homelessness in the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless and permanent housing for clients dealing with mental health and/or substance abuse issues.

Belmont Housing Resources for WNY administers the Section 8 rental assistance program for all of Erie County (except for City of Buffalo) and provides the greatest amount of housing and credit counseling

for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at the risk of mortgage default or foreclosure.

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

The Town of Tonawanda Office of Community Development has been collaborating with the Homeless Alliance of Western New York throughout the duration of the Homelessness Prevention and Rapid Re-Housing Program (HPRP) beginning in September of 2009. The Town understands the importance of coordinating the area's limited resources to address the problem of homelessness.

The Town maintains communication with the CoC Executive Director and funds the organization with an ESG subrecipient agreement for HMIS services. We consult with them on our Request for Proposals process and participate on the area's committee to help create intake and evaluation standards.

The Town has taken an active role on HAWNY's prevention group steering committee to help revise the 10-year plan to end homelessness in the Western New York Region.

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	Agency/Group/Organization	Erie County Department of Environment and Planning
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office of Community and Economic Development actively consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the Town and better allocate entitlement resources. Focus group meetings were held September 9-11, 2014 and October 22-24, 2014 with affordable/special needs housing and service providers, business associations, homeless service agencies, community building organizations, economic development officials, neighborhood groups, health and human service providers, and other stakeholders.
2	Agency/Group/Organization	AMHERST
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing and community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person interview to obtain information about the housing and community development needs of town residents.
3	Agency/Group/Organization	CHEEKTOWAGA TOWNSHIP
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing and community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person interview to obtain information about the housing and community development needs of town residents.

4	Agency/Group/Organization	Town of Tonawanda
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing and community development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person interview to obtain information about the housing and community development needs of town residents.
5	Agency/Group/Organization	ERIE COUNTY INDUSTRIAL DEVELOPMENT
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the economic development needs of Erie County.
6	Agency/Group/Organization	Erie County Health Department
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.
7	Agency/Group/Organization	Erie Co. Dept. of Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.

8	Agency/Group/Organization	Erie Co. Dept. of Social Services
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.
9	Agency/Group/Organization	Erie Co. Dept. of Mental Health
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.
10	Agency/Group/Organization	Erie Co. Dept. of Alcohol and Substance Abuse
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Community development needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.
11	Agency/Group/Organization	Erie Co. Office of Domestic Violence
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.

12	Agency/Group/Organization	Erie County Office for Disabled
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.
13	Agency/Group/Organization	NYS Division of Housing and Community Renewal
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group meeting to obtain information about the needs of the clients served by the agency.

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

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

Narrative

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

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

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

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

The Town of Tonawanda's goal for citizen participation is to ensure broad participation of its residents; housing, economic development, and other service providers; local departments; nonprofit organizations; neighborhood groups; and other stakeholders in the planning and implementation of community development and housing programs. The Town, through the ACT HOME Consortium, has laid out a Citizen Participation Plan (CPP) to broaden citizen participation. This CPP can be found in Appendix ____.

The purpose of the CPP is to establish the process by which citizens, public agencies, and other interested parties can actively participate in the development of the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), and to set forth the Town's policies and procedures for citizen participation.

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	No one attended	N/A	N/A	
2	Public Hearing	Non-targeted/broad community	No one attended	N/A	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)
3	Stakeholder interviews and meetings	Housing and community development stakeholders	<p>In September and October 2014, the ACT consortium towns participated in a series of housing and community development stakeholder meetings and interviews held by Erie County that covered a wide range of topics. A total of 51 agencies, organizations, and governmental bodies attended these meetings or were interviewed. The following is a summary of Erie County's oft-cited housing and community development needs and/or issues as expressed by stakeholders consulted during the Consolidated Plan planning process: coordination of care management,</p>	<p>The following is a summary of Erie County's oft-cited housing and community development needs and/or issues as expressed by stakeholders consulted during the Consolidated Plan planning process: coordination of care management, affordable housing and related services, homelessness-related services, inadequate/dwindling resources (funds and staff), connecting mental health services to employment opportunities, transportation (particularly in rural areas), supportive services, food insecurity, social isolation senior services, outreach to</p>	<p>All comments were accepted.</p>	

Consolidated Plan

TONAWANDA

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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)
4	Newspaper Ad	Non-targeted/broad community	Notice of the availability of the FY 2015-FY 2019 Consolidated Plan and the FY 2015 Annual Action Plan for public review was published in the Amherst BEE, Cheektowaga BEE, Ken-Ton BEE and the Metro	No comments received	N/A	
5	Internet Outreach	Non-targeted/broad community	The FY 2015-FY 2019 Consolidated Plan and the FY 2015 Annual Action Plan were posted on the websites of the ACT Consortium towns.	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)
6	Stakeholder interviews and meetings	Non-targeted/broad community	The ACT Consortium FY 2015-FY 2019 Consolidated Plan and Amherst's FY 2015 Annual Action Plan were on public display from December 19, 2014 to January 19, 2015.	No comments received	N/A	

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Along with the Town of Cheektowaga, the Town of Tonawanda is a member of the ACT HOME Consortium, of which the Town of Amherst is the lead grantee. Consequently, the Needs Assessment section of this Consolidated Plan only covers Tonawanda's portion of the Plan. The Needs Assessment sections specific to the Town of Tonawanda are this overview, NA-40 Homeless Needs, and NA-50 Non-Housing Community Development Needs.

The following overview of housing needs based on housing cost burden was created in CPD Maps based on 2005-2009 CHAS data, the latest available in CPD Maps. Cost burden is categorized by "HUD Area Median Family Income," or HAMFI, a HUD-calculation that is used to determine Fair Market Rents and income limits for HUD programs.

Housing Cost Burden

HUD defines housing cost burden as a household that pays more than 30% of household income for housing costs. The following map shows the percentage of low-income households that are cost burdened by census tract. Census Tract 83, bordered by the Niagra River, Interstate 190, Sheridan Drive, and Military Road, contains both a high concentration of cost-burdened households (55%) and a high poverty rate (43%). The tract with the next highest concentration of cost-burdened households (35%) covers the central portion of the Village of Kenmore.

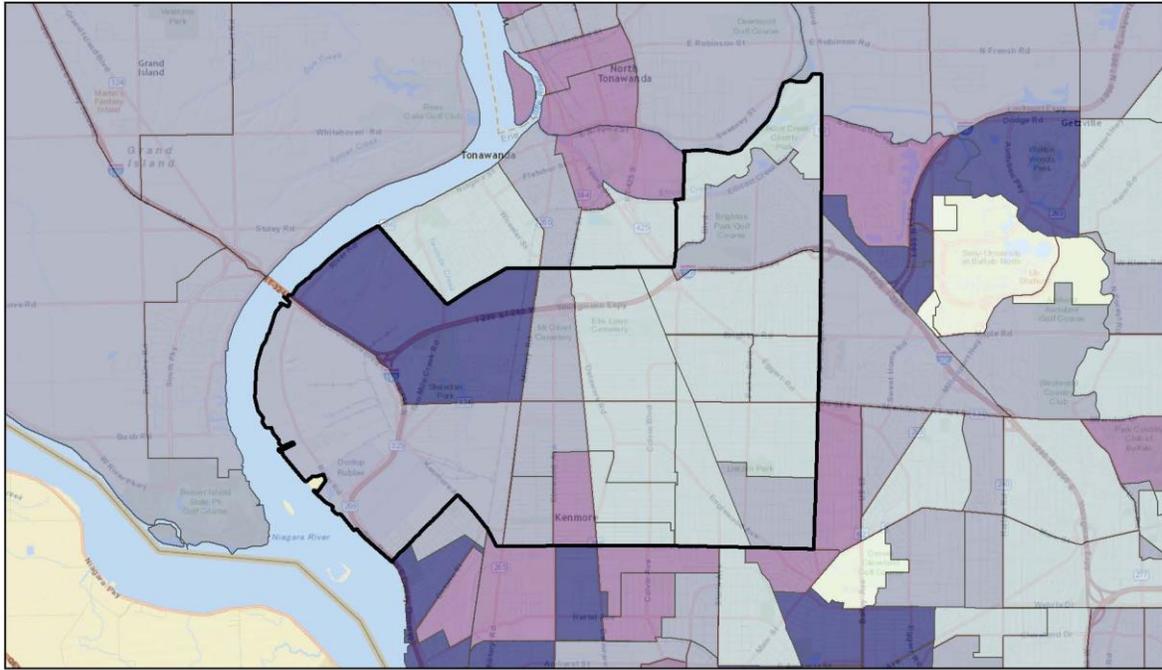
Severe Housing Cost Burden: Very Low-Income Households (31%-50% of MFI)

HUD defines severe housing cost burden as a household that pays more than 50% of household income for housing costs.

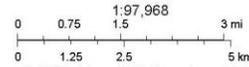
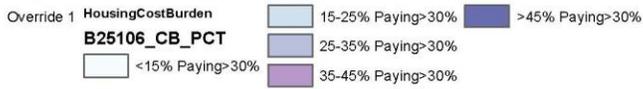
The highest concentration of severe cost burden for extremely low-income (ELI) households (those earning 0%-30% of the area's median family income) is in the northeast and southeast portions of the Town. This is partially due to the lower number of ELI households in those areas.

The pattern of severe cost burden for the larger category of very low-income households (those earning 31%-50% of the area's median family income) is roughly the same.

Town of Tonawanda - Cost Burden



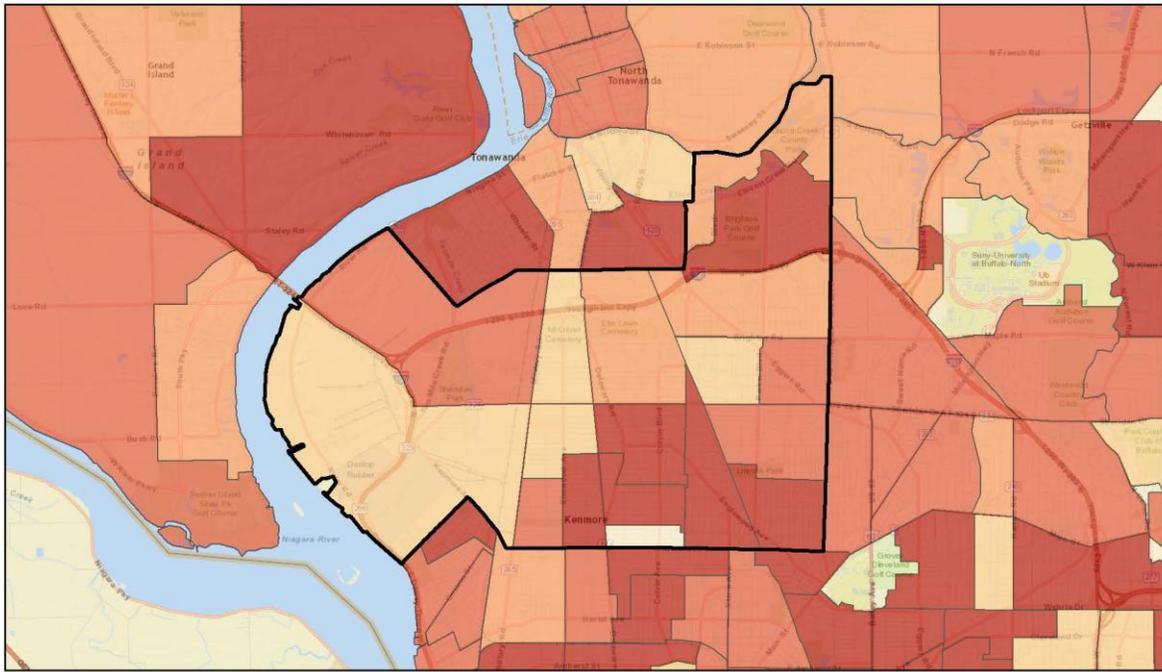
December 9, 2014



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Cost Burden

Town of Tonawanda - Extremely Low-income (0-30% AMI) Severe Cost Burden



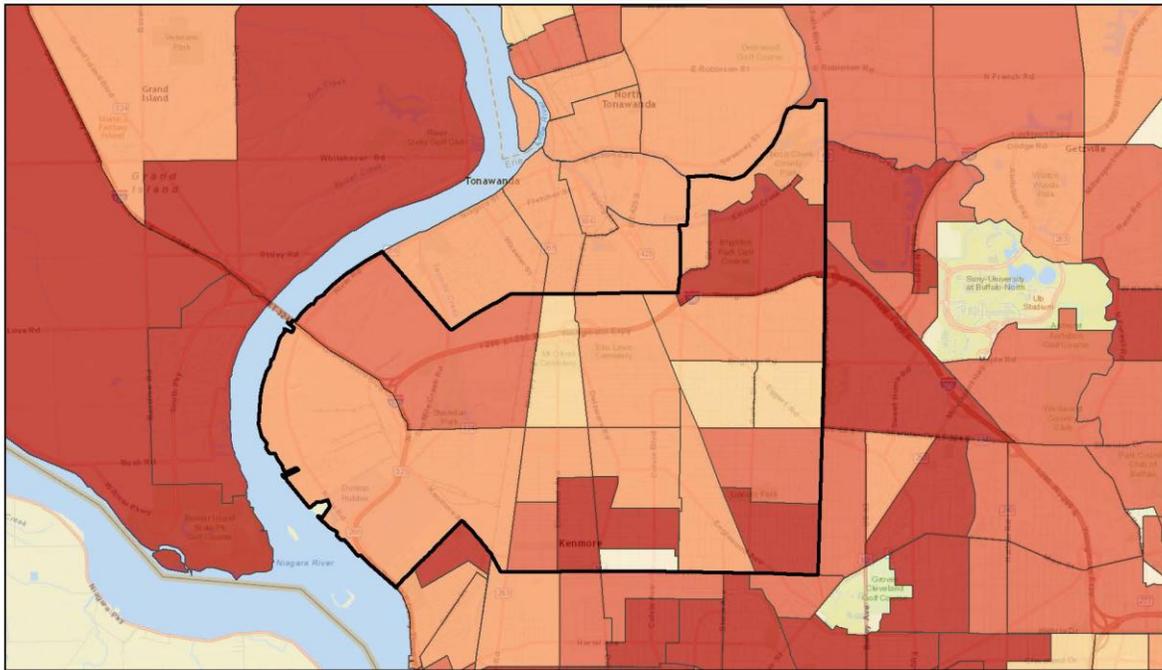
December 10, 2014

Override 1 ELIHHWithCostBurden
T8_LE30_CB50_PCT
 <20%
 20-40%
 40-60%
 60-80%
 >80%

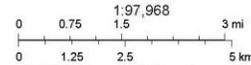
1:97,968
 0 0.75 1.5 3 mi
 0 1.25 2.5 5 km
 Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Extremely Low-Income (0-30% AMI) Severe Cost Burden

Town of Tonawanda - Low-income (0%-50% AMI) Severe Cost Burden



December 12, 2014



Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Low-Income (0-50% AMI) Severe Cost Burden

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

Introduction:

The Homeless Alliance of Western New York, which is the administrator of the Homeless Management Information System for Erie County, provided data on the homeless populations in the towns of Amherst, Cheektowaga and Tonawanda. The data is based on zip codes. However, zip code boundaries do not coincide with municipal boundaries. Some zip codes are split between two or more municipalities, and some Cheektowaga and Tonawanda zip codes are shared with the City of Buffalo, where 81% of the Buffalo-Niagara region homeless population is concentrated. Consequently, the homeless population data for zip codes shared with the City of Buffalo skews the homeless population data for Cheektowaga and Tonawanda.

The following 2013 homeless population data for the ACT Consortium towns covers homeless clients who were identified as having lived in the zip codes indicated for each town.

Amherst

Zip codes	Count
14051	8
14068	0
14221	36
14226	26
14228	33

Total 103

Cheektowaga

Zip code	Count
14206	232
14211	670
14215	1,292
14225	62
14227	33
14043	13
Total	2,303

Note: Zip codes 14206, 14211 and 14215 are shared with the City of Buffalo. For those zip codes unique to Cheektowaga, a total of 108 individuals were reported as experiencing homelessness.

Tonawanda

Zip code Count

14150	75
14217	37
14207	342
Total	454

Note: Zip code 14207 is shared with the City of Buffalo. For those zip codes unique to Tonawanda, a total of 112 individuals were reported as experiencing homelessness.

The following reports from the Continuum of Care covering Erie and Niagara counties contain totals for the sheltered and unsheltered homeless population gathered during the January 2014 point-in-time count. The count located 762 households containing 1,000 persons divided primarily between emergency shelter and transitional housing. Anecdotal data indicates that the majority of the homeless population in the Buffalo-Niagara region is concentrated in the City of Buffalo.

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

There is no information available to describe the number of persons who become homeless in Amherst, Cheektowaga or Tonawanda, nor the number of days that a person typically remains homeless in these communities. FOR THE FULL TEXT OF THIS SECTION SEE AD-25 (ADMINISTRATION), IN ATTACHMENTS: GRANTEE UNIQUE APPENDICES.

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.

There is no data available on these groups at the Consortium level.

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

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

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

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

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

Discussion:

As the data shows, there are 93 homeless persons being served in the three zip codes that are fully or partially within the Town of Tonawanda.

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

Describe the jurisdiction's need for Public Facilities:

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

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

How were these needs determined?

The Consortium facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. In addition, the age of public facilities in the three Consortium towns requires a systematic approach to maintenance, with repairs and updates made as needed to prevent or mitigate deterioration.

Needs are also identified through examination of the towns' comprehensive land use plans, neighborhood plans, and capital improvement programs.

Describe the jurisdiction's need for Public Improvements:

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

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

How were these needs determined?

The Consortium facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. In addition, Tonawanda will review older neighborhoods to monitor conditions and needs. Each year, CDBG funds will be used to address street and infrastructure

needs, thereby strengthening and protecting existing viable components of neighborhoods through the elimination of existing or potential threats to the public health, safety, and general welfare of residents.

Needs are also identified through examination of the towns' comprehensive land use plans, neighborhood plans, and capital improvement programs.

Describe the jurisdiction's need for Public Services:

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

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

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

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

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

How were these needs determined?

The Consortium facilitated a series of stakeholder interviews and focus groups in which it requested feedback on needs across the community. Ongoing assessments of existing services will determine when additional services will be provided.

Based on the needs analysis above, describe the State's needs in Colonias

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Tonawanda is a community of neighborhoods with individual housing assets and needs. This analysis identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ultimately, the Town is working to ensure that a mix of housing types exists within each neighborhood to accommodate households of all types and at all places across the income spectrum. The Town's housing strategies will be especially informed by the increasing mismatch between incomes and housing costs, the shortage of affordable housing, and the specific accommodations necessary to ensure that special needs populations have adequate affordable options.

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

Introduction

Stakeholders interviewed revealed that poverty is a leading cause of homelessness in the ACT Consortium, and that there are high numbers of persons living in poverty in the ACT Consortium. However, because poverty is not as concentrated as in the nearby City of Buffalo, it is often less noticeable. No homeless shelters are located within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium. Community Development staff in the Consortium’s towns have participated in the Prism Project Forum and Point in Time Count to survey the homeless and help to create a data base of services utilized by the chronically homeless. These projects, sponsored by the Homeless Alliance of Western New York, have produced a Ten-Year Action Plan for the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless, permanent housing for clients dealing with mental health and/or substance abuse issues.

Tonawanda receives an Emergency Solutions Grant Program grant from HUD and is a member of the Erie County Consortium for the Section 8 program administered by Belmont Housing Resources for WNY. There are no emergency shelters in the Town of Tonawanda, so the Town uses its ESG funds to contract with homeless service agencies throughout the region to assist homeless persons in Amherst, Cheektowaga, Tonawanda and the City of Buffalo.

There is a 79-bed transitional housing facility for homeless men with substance abuse issues located at 1080 Military Road in Tonawanda.

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

	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
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 5- 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 use to complement services targeted to homeless persons.

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

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

Physical and mental health care providers in the area include:

- Crisis Services Street Outreach Program, Lake Shore Behavioral Health Homeless Services, and Harbor House staff members conduct mental health screenings and assessments for low-income persons frequenting area soup kitchens and the area drop-in center.

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

A small number of local agencies provide small loans for the necessary household expenses including heat and utilities. These funds are available through Child and Family Services, Catholic Charities, Home Energy Assistance Program, National Fuel Advocates, American Red Cross, Belmont Housing Resources of WNY –Self-Sufficiency Program, Buffalo Urban League, and Community Action Organization. The Minority Women Business Entrepreneurs Loan provides funds for starting a home business. FOR THE FULL TEXT OF THIS SECTION SEE AD-25 (ADMINISTRATION), IN ATTACHMENTS: GRANTEE UNIQUE APPENDICES.

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

Hearts for the Homeless emergency shelter will continue to operate its mobile shelter. The motor home travels throughout the three towns in the Consortium as well as the City of Buffalo to find homeless persons and provide them with food and clothing. The homeless are assessed as to

their needs and referred to proper agencies. The Salvation Army will also cover these same costs for adults who find themselves in similar situations.

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

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

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

Introduction

In determining priorities for the allocation of federal funds, Tonawanda 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

According to the table below, the top business sectors that employ Tonawanda residents include Education and Health Care Services; Retail Trade; and Arts, Entertainment, and Accommodations. In 2010, the Town’s unemployment rate of 6.04% was below the statewide rate of 7.5% and the national rate of 7.9%. The vast majority (84%) of people employed in the Town live within a 30-minute drive.

According to a 2011 Economic Development Strategy, the Town of Tonawanda hosts a concentration of major, multi-national corporations (e.g. General Motors, DuPont, Goodyear-Dunlop, Praxair, 3M, and FMC) and a concentration of smaller manufacturing companies that serve markets outside the Buffalo-Niagara region. The Town also hosts a concentration of companies that provide such services as transportation, rigging, and construction contracting to businesses in our region and nearby regions. There is a strong base of manufacturing and commercial businesses that can attract new investment and employment within existing operations, and also serve as an attraction to suppliers or vendors. It is also likely that investment in the manufacturing sector will have a stronger multiplier effect within the community.

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	44	0	0	0	0
Arts, Entertainment, Accommodations	3,582	2,406	13	10	-3
Construction	989	1,662	3	7	4
Education and Health Care Services	5,981	5,078	21	21	0
Finance, Insurance, and Real Estate	2,760	1,097	10	4	-6

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Information	604	466	2	2	0
Manufacturing	2,882	4,696	10	19	9
Other Services	1,419	1,465	5	6	1
Professional, Scientific, Management Services	3,227	1,005	11	4	-7
Public Administration	23	0	0	0	0
Retail Trade	4,433	2,928	16	12	-4
Transportation and Warehousing	942	2,257	3	9	6
Wholesale Trade	1,473	1,450	5	6	1
Total	28,359	24,510	--	--	--

Table 6 - Business Activity

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

Labor Force

Total Population in the Civilian Labor Force	39,927
Civilian Employed Population 16 years and over	37,516
Unemployment Rate	6.04
Unemployment Rate for Ages 16-24	17.68
Unemployment Rate for Ages 25-65	4.13

Table 7 - Labor Force

Data Source: 2006-2010 ACS

Occupations by Sector	Number of People
Management, business and financial	8,251
Farming, fisheries and forestry occupations	2,051

Occupations by Sector	Number of People
Service	3,664
Sales and office	7,312
Construction, extraction, maintenance and repair	2,145
Production, transportation and material moving	1,616

Table 8 – Occupations by Sector

Data Source: 2006-2010 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	30,181	84%
30-59 Minutes	4,716	13%
60 or More Minutes	896	3%
Total	35,793	100%

Table 9 - Travel Time

Data Source: 2006-2010 ACS

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	893	349	854
High school graduate (includes equivalency)	7,152	582	2,433
Some college or Associate's degree	10,484	426	2,268
Bachelor's degree or higher	11,262	247	1,842

Table 10 - Educational Attainment by Employment Status

Data Source: 2006-2010 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	46	81	55	247	565
9th to 12th grade, no diploma	388	423	414	876	1,612
High school graduate, GED, or alternative	1,721	1,860	2,318	5,989	5,680
Some college, no degree	2,788	1,722	1,664	4,358	2,510
Associate's degree	477	1,089	1,165	3,214	675
Bachelor's degree	1,553	2,849	1,882	3,800	1,348
Graduate or professional degree	48	1,339	1,098	2,410	1,318

Table 11 - Educational Attainment by Age

Data Source: 2006-2010 ACS

Educational Attainment – Median Earnings in the Past 12 Months

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

Table 12 – Median Earnings in the Past 12 Months

Data Source: 2006-2010 ACS

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

The Education and Health Care Services sector employs the largest number of workers, which represents 19% of employed residents, followed by the Retail Trade sector which employs 14% of Township residents.

Describe the workforce and infrastructure needs of the business community:

In the Business Activity table, the largest category in the “Jobs Less Workers” column (which indicates commuting) is within the Professional, Scientific, and Management Services sector, followed by the Finance, Insurance, and Real Estate sector. This may indicate a large number of commuters who come into Tonawanda to work in higher-paying jobs, and a large commuter population from Tonawanda commuting to lower-paying jobs in the greater Buffalo-Niagara region.

According to a report by Erie Community College, the most significant workforce needs in the region relate to the aging population, the need for workers to remain current with ever-changing technology, and the skills gap that results from a mismatch between educational programs and workforce needs. The industrial mix found in the region requires maintaining or increasing the number of educated, well-trained, and largely professional workforce participants.

A recent study of the regional labor market commissioned by the Buffalo Niagara Enterprise (BNE) provides valuable insight for development of an economic development strategy. The study examines labor availability, labor demand, labor quality, labor cost, and statistical profiles of the region’s eight counties. Key assets and challenges are reviewed, and conclusions are presented:

- While manufacturing is a core industry, the region must transition into a more innovative and dynamic environment with a focus towards other industry sectors.
- The region should focus on niche manufacturing opportunities or other manufacturing sub-sectors where there is likely to be a future demand (i.e. – automotive, advanced materials and energy).
- The region is a candidate for more sophisticated operations such as biotechnology, nanotechnology and information technology operations.
- The cost of labor gives the region a competitive advantage over other areas.
- Entrepreneurship should be encouraged through innovation networks.

Transportation is a major issue in the region, especially for low-income workers. Stakeholder interviews noted that many of the low-paying jobs in the first-ring towns are actually held by low-income residents of the City of Buffalo, resulting in significant number of “reverse commuters” traveling from the city into the suburbs. Lack of or inadequate transportation from affordable housing locations to low-wage jobs is a significant issue for low-income residents in the region, particularly for those residents trying to locate near jobs or other opportunity-creating amenities. Due to the area’s large number of health care jobs, there are a significant number of third-shift workers or other workers with atypical work hours. This population has difficulty using the existing transit system, which caters to commuters working traditional peak hours. Stakeholder interviews revealed that there is little local interest in reverse commuter van programs, and the Metropolitan Planning Organization determined that this type of program would require heavy subsidy.

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

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

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

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

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

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

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

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

The ACT Consortium participates in the workforce development and training initiatives sponsored by the Buffalo and Erie County Workforce Investment Board. This includes WorkSourceOne, a one-stop career center that offers counseling and career exploration, resume preparation and letter writing services, job search planning and preparation, career training, job referral and placement, math and reading assistance, GED preparation, a state of the art resource center, supportive services, and financial aid. Erie Community College also participates in the WorkSourceOne initiative as a one-stop shop for these resources. While these centers are in Buffalo and Orchard Park, they are accessible for residents of all the communities in the Consortium, including Tonawanda. These efforts aim to reduce the skills gap described by both stakeholders and the HUD data in order to fill jobs and reduce the disparity in education within the Consortium.

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

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

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

Yes

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

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

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

Finally, the Town of Tonawanda Development Corporation (TTDC) commissioned an Economic Development Strategy in 2011. The key goals of the strategy are: increase the supply of new sites and buildings, increase the expansion and rehabilitation of existing properties, strengthen the local economy, improve community well-being and environmental protection, boost not-for-profit participation, enhance marketing strategies. The EDS defines specific "target areas" and "target businesses" in the Town where resources and investments should be concentrated.

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

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

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

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

Discussion

MA-50 Needs and Market Analysis Discussion

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

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

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

In this case, "concentration" is defined as having a value within the top two quintiles of the distribution, which in this case is a value over 56.45%.

Within Tonawanda, the highest concentration of severe housing problems is in the northeast portion of the town, near the Brighton Park Golf Course. Another somewhat high concentration of housing problems is the southeast corner of the Town, stretching westward to cover parts of the Village of Kenmore.

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

All the communities in the ACT Consortium are predominantly White. Defining "concentration" as meaning having areas within the top quintile of the percentage distribution, there are three census tracts in Tonawanda with the highest concentrations of racial or ethnic minorities:

- Census Tract 79.01, covering Irvington Creekside and Raintree Island
- Census Tract 83, bordered by the Niagara River, Interstate 190, Sheridan Drive, and Military Road
- Census Tract 88, between Military Road and Elmwood Ave, and Kenmore Road and Shepard Avenue in Kenmore.

Census Tract 88 also has the highest concentration of low- and extremely low-income households, as well as the highest poverty rates in the town.

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

Census Tract 83, which has the town's highest concentrations of non-whites and low-income households, is comprised mostly of industrial land and one residential neighborhood called Sheridan Parkside. According to the 2003 Sheridan Parkside Neighborhood Plan, this community was constructed

as “temporary” wartime housing in the World War II era, and consists primarily of multi-family housing. Many of the attached units are deteriorated and in sub-standard condition. Achievable rents are low, and the area has become increasingly characterized by a concentration of low-income residents. It has been a goal of the Town of Tonawanda Office of Community Development to transform the Sheridan Parkside neighborhood into a more diverse community, with a greater range of housing opportunities for varying income levels.

Are there any community assets in these areas/neighborhoods?

Yes. There is a community center (a former two-story elementary school) that occupies a 6.5-acre site in the center of the community, on Sheridan Parkside Drive. The site includes a spray park, a small basketball court, two children's play areas, a gazebo, and two paved parking lots. In addition to the parkland around the community center, there are two small neighborhood parks: the Curwood play area, which is situated off Curwood Court; and the Friendship play area, located off Tarkington Court. Sheridan Park Golf Course bounds the western edge of the neighborhood, on the western side of East Park Drive.

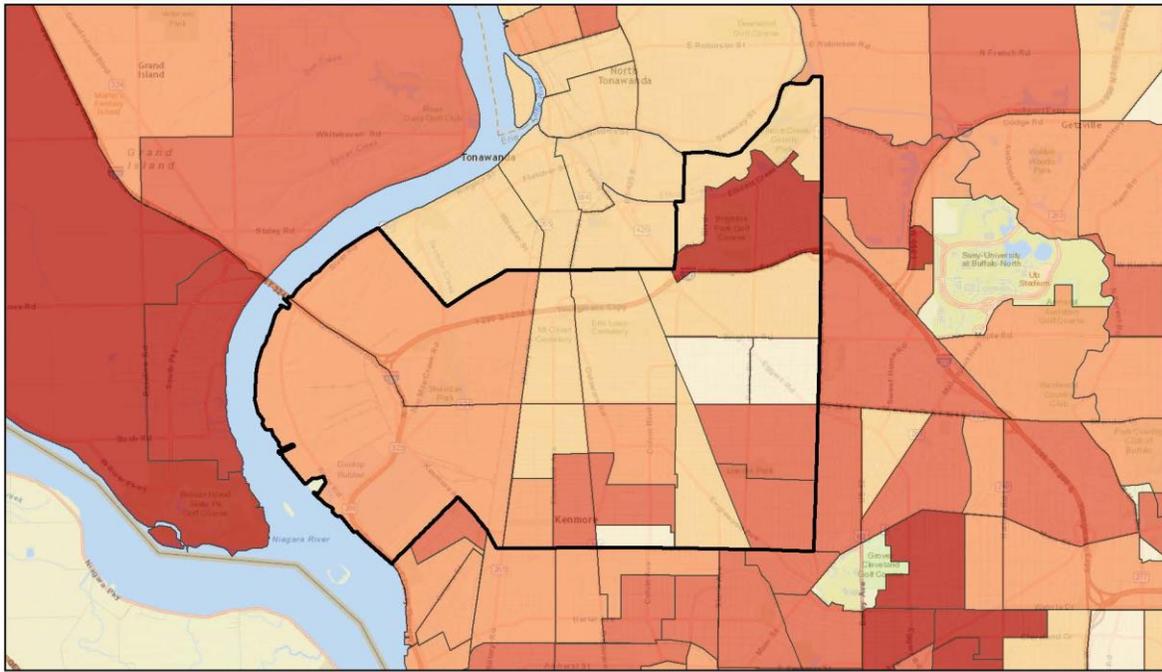
There are several community facilities along Ensminger Road, including athletic fields, St. Timothy's Church and the associated senior housing facility at Ensminger and East Park, the S.P.C.A. facility, and the Town's Senior Citizen Center at 291 Ensminger. Ensminger also has a mix of commercial uses, including retail, trucking and light industrial uses. In general, land uses toward the eastern end of the neighborhood, approaching Military Road, are more industrial in nature, while community facilities tend to be located toward the western end of the neighborhood, closer to the golf course.

Are there other strategic opportunities in any of these areas?

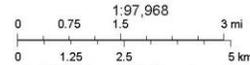
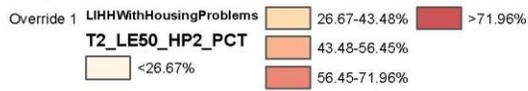
Yes. The Sheridan Parkside Neighborhood Plan describes the future vision of the neighborhood, including:

- A mix of housing types, including small homes for seniors and families without children, larger single-family detached homes for families, and some two-family homes
- Creating special gateway treatments to identify and highlight the major points of entry to Sheridan Parkside
- Development of attractive streetscaping along streets that have been designated as major boulevards through the neighborhood
- Updates to the street grid to improve vehicle circulation
- Installing detached sidewalks on all neighborhood streets, allowing children and adults to walk in safety to neighborhood parks, and the community center
- An expanded central park and new pocket parks
- A new community library

Town of Tonawanda - Low-Income Households w/ Severe Housing Problems



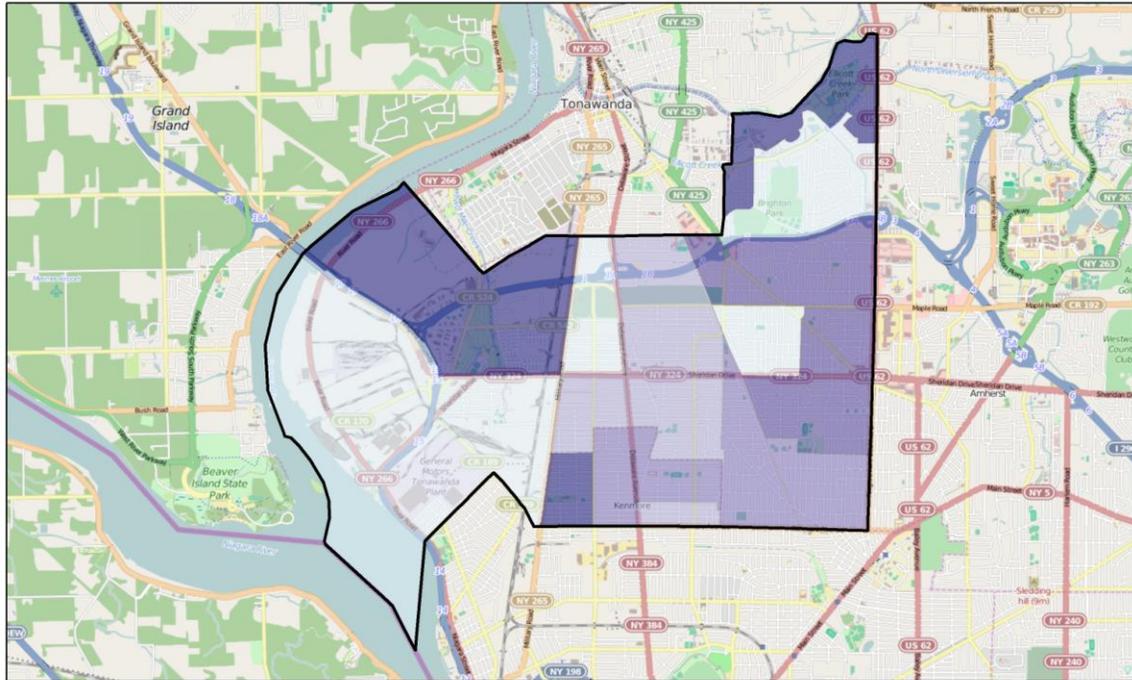
December 11, 2014



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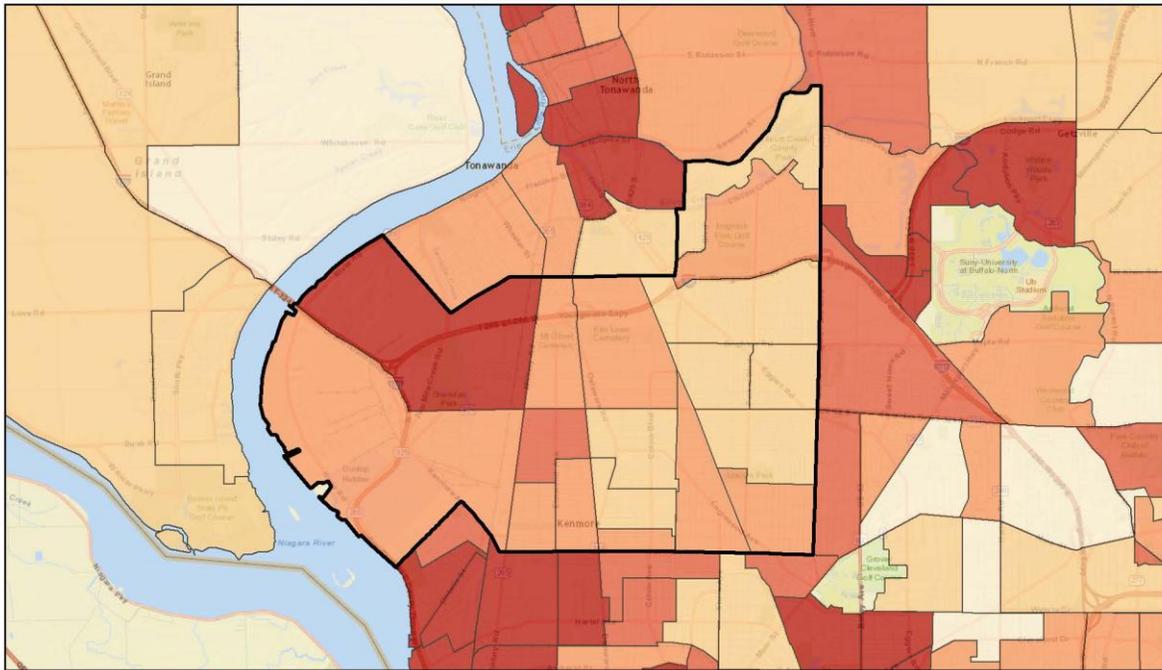
Low-Income Households w/ Severe Housing Problems

Town of Tonawanda - Areas of Racial/Ethnic Concentration

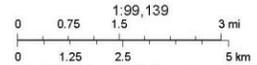
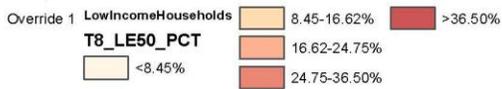


Areas of Racial/Ethnic Concentration

Town of Tonawanda - Low-income (0%-50% AMI) Households



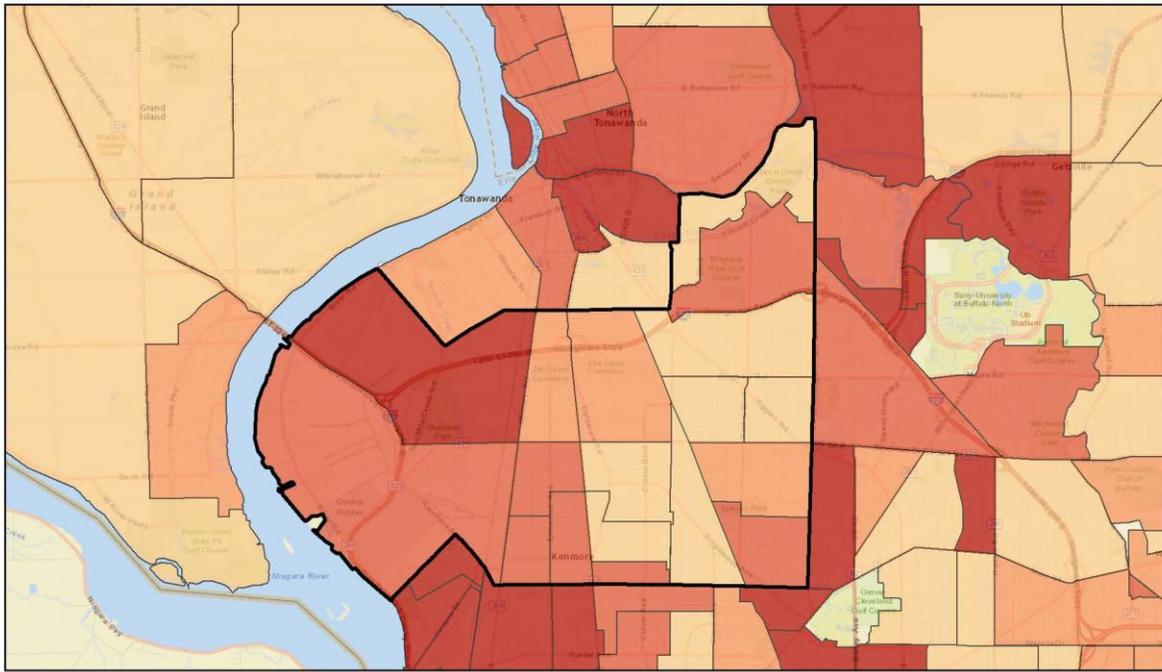
December 12, 2014



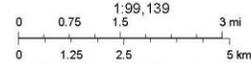
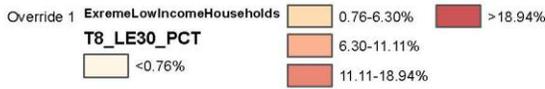
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Low-Income (0-50% AMI) Households

Town of Tonawanda - Extremely Low-income (0%-30% AMI) Households



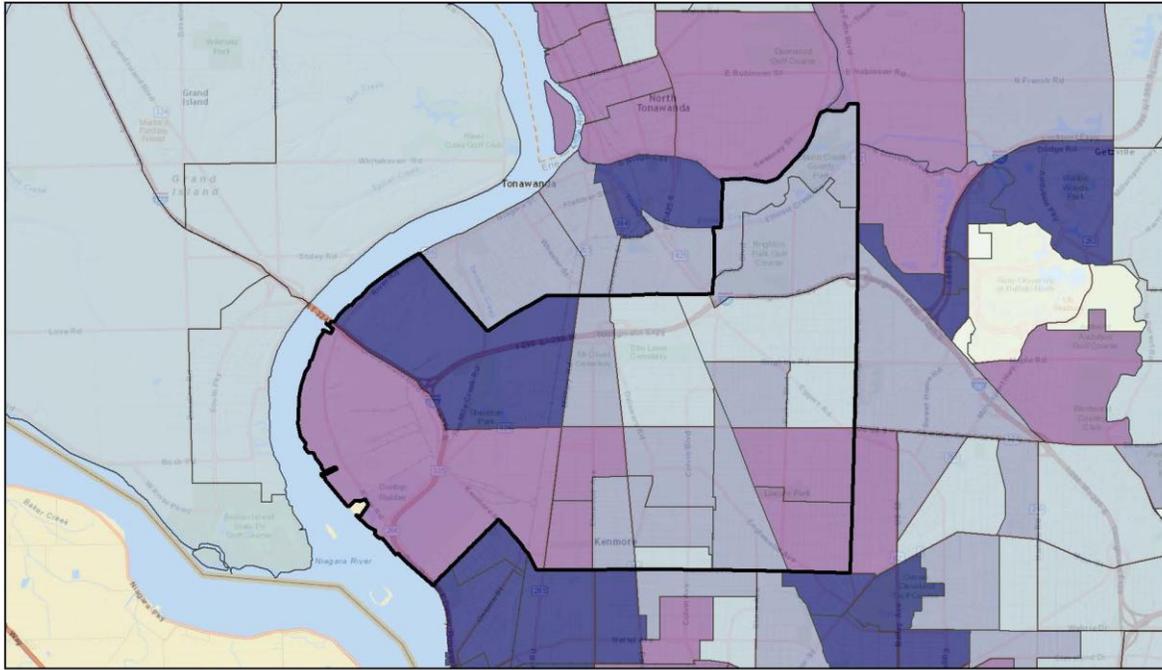
December 12, 2014



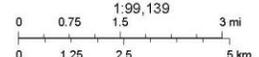
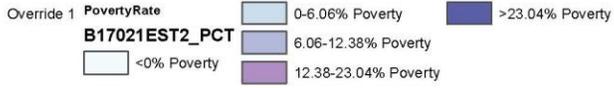
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Extremely Low-Income (0-30% AMI) Households

Town of Tonawanda - Poverty Rate



December 11, 2014



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Poverty Rate

Strategic Plan

SP-05 Overview

Strategic Plan Overview

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

Assisting income eligible homeowners remains a priority for the Consortium. Consequently, the towns will continue to use their owner-occupied housing rehabilitation programs as the principal vehicle to assist homeowners. Each Consortium town operates its own loan program with CDBG and HOME funds, and each maintains a substantial waiting list. A majority of homes assisted through the program will undergo the removal of at least some lead paint hazards. In addition to eligible corrective work, access improvements, such as wheelchair ramps and doorway modifications, are also eligible work items for physically disabled persons in low- and moderate- income households.

Priorities

In Tonawanda, the focus will be on the Sheridan-Parkside, Old Town, and Kenilworth neighborhoods. In general, Consortium owner-occupied housing rehabilitation activities will be focused in each towns' older neighborhoods, where infrastructure improvements will also be undertaken with CDBG funds.

In Tonawanda, priority needs include:

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

-

Influence of Market Conditions

This plan identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ultimately, the Consortium is working to ensure that a mix of housing types exists within each community to accommodate households of all types and income levels. The Consortium's housing strategies will be especially guided by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options. FOR THE FULL TEXT OF THIS SECTION SEE AD-25 (ADMINISTRATION), IN ATTACHMENTS: GRANTEE UNIQUE APPENDICES.

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

Geographic Area

Table 13 - Geographic Priority Areas

1	Area Name:	Old Town
	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.	The Old Town Neighborhood contains 9 street blocks and measures about 65 acres in size. It is bound by the Niagara River to the West, the City of Buffalo's Riverside Park to the South, and the GM Powertrain Plant to the North and East. It is Census Tract 84, Block Group 3.
	Include specific housing and commercial characteristics of this target area.	The neighborhood consists of about 400 living units, of which about 15% are not suitable for rehabilitation and can be considered uninhabitable. There are approximately 170 rental units and 180 owner-occupied units. The residential vacancy rate in this neighborhood trends higher than the Town overall (9% vs. 3%). The neighborhood is served by some limited commercial retail located along Vulcan Street and River Road. There is also a Boys & Girls Club located at 54 Riverdale Avenue that acts as a neighborhood anchor.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	A Neighborhood Plan was completed in 2009 and will soon be adopted as part of the Town's Comprehensive Plan. Community engagement was a large part of the planning process. Several action items identified in the plan are currently being implemented.
Identify the needs in this target area.	The ACS data shows that the population's low-moderate income rate is approximately 88%. The biggest issues in the neighborhood involve deferred maintenance of a large proportion of rental housing structures than the Town overall. Code enforcement, crime prevention, and neighborhood revitalization including demolition of substandard vacant structures are high priority needs.	

	<p>What are the opportunities for improvement in this target area?</p>	<p>The Neighborhood Plan identified the need to attract new owner occupied housing to help provide a sustainable balance for all housing needs in the neighborhood. The plan also identified upgrading the street lighting pattern, recreational facilities, and to provide economic development programs that serve the neighborhood. The Town will continue to address any structures that become neglected through deferred maintenance.</p>
	<p>Are there barriers to improvement in this target area?</p>	<p>The major barriers to improvement in this area are a lack of resources to accomplish neighborhood revitalization projects, build decent affordable housing, and provide loans for small business development. Also, the neighborhood is geographically isolated from the majority of the Town so many people associate the area with the City of Buffalo.</p>
<p>2</p>	<p>Area Name:</p>	<p>Sheridan-Parkside</p>
<p>Area Type:</p>	<p>Local Target area</p>	
<p>Other Target Area Description:</p>	<p></p>	
<p>HUD Approval Date:</p>	<p></p>	
<p>% of Low/ Mod:</p>	<p></p>	
<p>Revital Type:</p>	<p>Comprehensive</p>	
<p>Other Revital Description:</p>	<p></p>	
<p>Identify the neighborhood boundaries for this target area.</p>	<p>Sheridan-Parkside is a 160-acre WWII-era 1,200-unit development just West of Military Road, North of Sheridan Drive, East of East Park Drive, and South of Ensminger Road. It consists of Census Tract 83, Block Groups 1, 2, and 3.</p>	

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>The neighborhood has a high proportion of rental units (79%) compared to the Town as a whole (27%). Since the early 1990's, the Town has demolished approximately 250 vacant substandard housing units and built 37 new affordable single-family homes in Sheridan-Parkside. The residential vacancy rate in this neighborhood trends higher than the Town overall(12% vs. 3%). The neighborhood is served by some limited commercial retail located along Sheridan Drive and Ensminger Road. The Town maintains a heavily utilized Youth Center, Senior Center, and many parks in this neighborhood.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>This neighborhood has historically been well organized and local groups participate in local government board meetings and invite elected officials to their group functions where they clearly communicate issues affecting their neighborhood. A Neighborhood Redevelopment Plan was completed in 2003 and adopted as part of the Town's Comprehensive Plan in 2005. Several action items identified in the plan are currently being implemented.</p>
<p>Identify the needs in this target area.</p>	<p>The ACS data shows a low-mod percentage of approximately 77%. The biggest issues in the neighborhood involve deferred maintenance of a large proportion of rental housing structures than the Town overall. Code enforcement, crime prevention, and neighborhood revitalization including demolition of substandard vacant structures are high priority needs.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>The Neighborhood Redevelopment Plan identified the need to attract new owner occupied housing to help provide a sustainable balance for all housing needs in the neighborhood. The plan also identified several upgrades to the street network and recreational facilities that serve the neighborhood.</p>

	Are there barriers to improvement in this target area?	The major barriers to improvement in this area are a lack of resources to accomplish neighborhood revitalization projects and build decent affordable housing. Also, the historical stigma of the neighborhood as a WW-II era public housing development has hindered recent new home sales even though the U.S. Government sold all of the housing during the 1940's to private investors. The image of the neighborhood is changing, but remains prevalent.
3	Area Name:	Lincoln Park
	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.	Lincoln Park Neighborhood is the largest and most populous of the low-moderate income neighborhoods in Tonawanda. It is located in the Southeast section of the Town just North of the University at Buffalo's Main Street Campus. It consists of Census Tract 80.01, B.G. 1 and 5. Also, it includes Census Tract 80.03, B.G. 3.
Include specific housing and commercial characteristics of this target area.	The neighborhood consists of about 3,200 persons, of which about 50% are considered low-moderate income. There is a high proportion of rental units in this neighborhood than the Town average. The residential vacancy rate in this neighborhood is about the same as the Town's average (3%). The neighborhood is served by some limited commercial retail located along Lincoln Park Blvd, Kenmore Avenue, Sheridan Drive, and Niagara Falls Blvd. There is a large educational facility, government offices, large park, and several religious facilities that anchor the neighborhood.	

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The Town receives feedback throughout the year from a neighborhood watch group that remains active in crime resistance activities.
	Identify the needs in this target area.	The ACS data shows that the population’s low-moderate income rate is approximately 50%. The biggest issues in the neighborhood involve deferred maintenance of a large proportion of rental housing structures than the Town overall. Code enforcement, crime prevention, and neighborhood revitalization including demolition of substandard vacant structures are high priority needs.
	What are the opportunities for improvement in this target area?	The Town will continue to address any structures that become neglected through deferred maintenance. An expanded Code Enforcement Program combined with targeted neighborhood revitalization projects can act as a catalyst for more private investment in the neighborhood.
	Are there barriers to improvement in this target area?	The major barriers to improvement in this area are a lack of resources to accomplish neighborhood revitalization projects and build more decent affordable housing.
4	Area Name:	Village of Kenmore
	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.	The Village of Kenmore is a 1.5 square mile municipal corporation located immediately North of the City of Buffalo following Delaware Avenue, Elmwood Avenue, and Military Road. It consists of Census Tracts 85, 86, 87, and 88. Specifically, the Southeast section of the Village that is designated low-moderate income would receive targeted funding. The HUD eligible areas consist of CT 85 B.G. 1; CT 86 B.G. 5; C.T. 87 B.G. 2; and C.T. 88 B.G. 3.

<p>Include specific housing and commercial characteristics of this target area.</p>	<p>The eligible neighborhood consists of about 4,325 persons, of which 56% are considered low-moderate income. There is a higher proportion of rental units in this neighborhood than the Town overall. The residential vacancy rate in this neighborhood is somewhat elevated from the Town’s average (3%). The neighborhood is served by commercial retail located along Delaware Avenue, Elmwood Avenue, Military Road, and Kenmore Avenue. There are several public facilities including educational buildings, government offices, large park, and several religious facilities that anchor the neighborhood.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>The Town receives feedback throughout the year from elected officials and municipal staff that handle the day to day operations throughout the Village. A 3-year cooperative agreement was formed that provides details on the projects and programs carried out throughout the year.</p>
<p>Identify the needs in this target area.</p>	<p>The ACS data shows that the population’s low-moderate income rate is approximately 56%. The biggest issues in the neighborhood involve deferred maintenance of a large proportion of rental housing structures than the Town overall. Code enforcement, crime prevention, and maintaining public infrastructure are high priority needs.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>The Town will continue to work with the Village to address any structures that become neglected through deferred maintenance or vacancy. An expanded Code Enforcement Program combined with targeted neighborhood revitalization projects can act as a catalyst for more private investment in the neighborhood.</p>
<p>Are there barriers to improvement in this target area?</p>	<p>The major barriers to improvement in this area are a lack of resources to accomplish neighborhood revitalization projects, public infrastructure and build more decent affordable housing.</p>

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

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

Priority Needs

Table 14 – Priority Needs Summary

1	Priority Need Name	Residential Rehabilitation - Owner Occupied
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	
	Associated Goals	Residential Rehabilitation - Owner Occupied
	Description	The Town of Tonawanda will offer 0% interest, deferred payment loans to low-moderate income homeowners to address home repair issues such as leaking roofs, heating, plumbing, electrical, and foundation wall repairs. Loans will be secured through a mortgage filed in the Erie County Clerk's Office.
	Basis for Relative Priority	The Town of Tonawanda has over 33,000 housing units, 80 % of which are over 60 years of age. With a low-moderate income population of 43%, the overall cost for home repair is not attainable by the average homeowner. Maintaining the condition of homes in a neighborhood has been cited as a high priority through the Town's Comprehensive Plan. This program provides the needed capital to maintain the Town's housing stock in a standard condition. Since 1978, the Town has assisted about 1 in 12 homes through this program.
2	Priority Need Name	Public Infrastructure
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Infrastructure
	Description	The Town intends to fund several infrastructure projects over the next five years within low-moderate income neighborhoods including sidewalk replacement, street resurfacing, water and sewer line construction.
	Basis for Relative Priority	The Town has identified severe funding gaps through a critical water infrastructure needs analysis and the Comprehensive Planning process. The Town is several hundred million dollars short of meeting its actual need for infrastructure reconstruction. Without viable and sustainable critical water systems and transportation networks, the Town's ability to sustain public health and viability would be imperiled.
3	Priority Need Name	Neighborhood Revitalization
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Neighborhood Revitalization
	Description	The Town will use its CDBG resources to acquire and demolish vacant, substandard structures that pose a health and safety threat to neighborhood residents. The land will then be temporarily held until a new, affordable housing unit can be built on the lot by the Town's Community Housing Development Organization.

	Basis for Relative Priority	Vacant, substandard housing has been cited by neighborhood citizens as a rising concern throughout the course of the last 10 years. It is the desire of neighborhood residents that the Town provide sufficient resources to deal with any vacant, derelict property as quickly as possible.
4	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Economic Development
	Description	The Town will provide a low-interest loan of variable duration to microenterprises that are in need of working capital in sustaining their business operations within the Town. The Town will also provide low interest loans to assist businesses that promise to hire low-moderate income workers.
	Basis for Relative Priority	Job creation has been identified as a high priority by the community to maintain a desirable live, work, play community. Demographics have shown a persistently high unemployment number and local businesses have identified a skills gap among eligible working age candidates.
5	Priority Need Name	Housing Counseling
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	
	Associated Goals	Housing Counseling
	Description	The Town contracts with a HUD-certified housing counseling agency to provide one-on-one counseling with low-moderate income eligible residents with housing issues, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc...
	Basis for Relative Priority	American Community Survey statistics show that a large segment of the Town's residents experience financial stress that may lead to housing instability issues. A housing counselor assists these residents with budgeting, financing, and referrals.
6	Priority Need Name	Residential Rehabilitation - Rental
	Priority Level	Low
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Residential Rehabilitation - Rental

	Description	The Town and Village will both operate a Residential Rehabilitation – Rental program that will rehabilitate approximately 15 units of affordable rental housing in owner-occupied 2-unit structures. The Town or Village will provide a 0% interest, deferred payment loan to the property owner to rehabilitate their multi-unit residence.
	Basis for Relative Priority	Affordable rental housing is in high demand and both the Town and Village have approximately 2,600 2-unit structures that were built prior to 1960. Many of these units have not been maintained properly and are showing signs of deterioration.
7	Priority Need Name	Provide Assistance to Disabled Persons
	Priority Level	Low
	Population	Extremely Low Low Moderate Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	
	Associated Goals	Disabled Persons Assistance
	Description	The Town will provide a 0% interest, deferred payment loan of up to \$5,000 for residents to make accessibility modifications to their home. Improvements may include accessible bathroom, kitchen, doorway, or ingress/egress modifications.
	Basis for Relative Priority	The Town and Village demographics have shown a higher than average low-moderate income senior population that would rather age in place in their communities than move into a higher density living environment. Also, more wartime veterans are returning home with life altering injuries that need assistance in gaining independent living.
8	Priority Need Name	Provide Assistance to Secure Affordable Housing
	Priority Level	Low

	Population	Extremely Low Low Moderate Large Families Families with Children
	Geographic Areas Affected	
	Associated Goals	Secure Affordable Housing
	Description	The Town will provide a 0% interest, deferred payment loans to assist first-time homebuyers afford the closing costs on their first home.
	Basis for Relative Priority	The Town and Village have a very affordable housing stock that is in the process of converting from an older generation to younger families. These loans provide the catalyst for them to make the purchase of their first home.
9	Priority Need Name	Public Facilities
	Priority Level	Low
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Public Facilities
	Description	
	Basis for Relative Priority	Both neighborhood plans and the Town's comprehensive land use plan have identified the need to maintain neighborhood assets and community gathering places that help keep social networks intact.
10	Priority Need Name	Provide Weatherization Assistance
	Priority Level	Low
	Population	Extremely Low Low Moderate

	Geographic Areas Affected	
	Associated Goals	Weatherization Assistance
	Description	The Town will contract with Supportive Services Corporation to provide energy audits for Town and Village residents. Any inefficiencies identified in the audit may be eligible for grant funded work items such as insulation, caulking, or newer energy-efficient appliances.
	Basis for Relative Priority	The Town and Village have approximately 33,000 housing units of which 80% were built prior to 1960. Many of these homes have deteriorated to the point of becoming energy inefficient.
11	Priority Need Name	Code Enforcement
	Priority Level	Low
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Code Enforcement
	Description	The Town and Village will provide NYS Code Enforcement Officers in low-moderate income neighborhoods to identify and correct housing code violations in order to sustain a decent living condition for all those in the neighborhood.
	Basis for Relative Priority	The Town and Village have approximately 23,000 housing units of which 80% were built prior to 1960. Many homeowners have deferred maintenance to the point of becoming neighborhood “eyesores” and local residents have identified cleaning up these properties as a priority in maintaining a decent living condition.
12	Priority Need Name	Provide Assistance to the Homeless
	Priority Level	Low

	Population	Extremely Low Low Moderate Individuals Families with Children veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Homeless Assistance
	Description	The Town will coordinate with the Homeless Alliance of WNY in determining emergency shelters and homeless service agencies that will provide the best services for the local homeless population or those at-risk of becoming homeless.
	Basis for Relative Priority	The Town and Village demographics have shown an increased number of households who are at-risk of becoming homeless and have identified runaway youth, victims of domestic violence, and families with children as highly vulnerable populations.
13	Priority Need Name	Public Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Services
	Description	The Sheridan-Parkside Youth Services Program (Prime Time) provides structured recreational activity for youth ages 6-18 during after school hours and also throughout the summer season. A Community Policing Program offers residents an opportunity to interact with police officers through neighborhood watch programs and neighborhood satellite police stations.

	Basis for Relative Priority	Public safety and providing structured recreational activities for at-risk neighborhood youth were identified by residents of the Town through neighborhood planning activities.
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Narrative (Optional)

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 Reminder 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	1,511,168	350,000	3,063,116	4,924,284	5,500,000	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	135,310	0	0	135,310	541,240	

Table 15 - 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

A majority of the federal CDBG resources will be used in the Town's Residential Rehabilitation Program to address the severe demand for home repairs to maintain sustainable neighborhoods. These resources are provided via a 0% interest, deferred payment loan that is paid back when the property transfers in the future through a sale, the death of the homeowner, or the property fails to remain the principal residence of the original homeowner. This revolving loan fund provides approximately \$350,000 of needed revenue to make additional loans to low-moderate income homeowners in need of repair assistance.

A portion of the HOME funding is used to assist homeowners purchase their first home. These closing cost assistance funds make it possible for private banks to lend first mortgages to these first-time homebuyers to purchase their first home.

Lately, it seems that most publicly funded projects contain a mixture of several sources of funding that are needed to make a project successful. For instance, a recent clean up effort at a River Road facility contained funding from the State of New York Department of Environmental Conservation, the Erie County Department of Environment & Planning, as well as CDBG funding that was used for site clearance. If any one of those pieces of funding were not present, the project would never have been completed. It is becoming ever important to pool available resources to make a successful project.

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

The Town of Tonawanda has several parcels of land banked for use in the Town's First-Time Homebuyer Program in accordance with local neighborhood plans for Old Town, Sheridan-Parkside, and in Kenilworth. The land is acquired when the Town uses CDBG funds to demolish a substandard, vacant structure. The property is then temporarily stored until a new, high-quality affordable housing unit may be built on the property. The Town may also place modular housing on the sites in the future to meet the demand for more quality affordable housing.

Some of the property may be used for other neighborhood improvements such as road connections, or recreational areas depending on its specific location in the neighborhood 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	Non-profit organizations	Ownership Rental	Region
CHEEKTOWAGA TOWNSHIP	Government	Ownership Rental	Jurisdiction
AMHERST	Government	Ownership Rental	Jurisdiction
NEW OPPORTUNITIES COMMUNITY HOUSING DEVELOPMENT CORP	Non-profit organizations	Ownership	Jurisdiction
HOUSING OPPORTUNITIES MADE EQUAL	Non-profit organizations	Rental	Region
BUFFALO URBAN LEAGUE	Non-profit organizations	Ownership Rental	Region
SUPPORTIVE SERVICES	Non-profit organizations	Ownership Rental	Jurisdiction

Table 16 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths

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

Gaps

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

- **Community-based organizations.** The region has only two community-based organizations that deliver housing programs with funding through the ACT Consortium, HUD, and State housing areas.

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

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy			
Legal Assistance			
Mortgage Assistance			
Rental Assistance			
Utilities Assistance			
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse			
Child Care			
Education			
Employment and Employment Training			
Healthcare			
HIV/AIDS			
Life Skills			
Mental Health Counseling			
Transportation			
Other			

Table 17 - Homeless Prevention Services Summary

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

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

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

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

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

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

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

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

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

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

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.

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

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

Strengths

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

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

Gaps

One area in need of improvement will be the determination of need of those who are not presently accessing services. This need is of particular importance in those rural areas of the Consortium that are often not served with traditional low-income service providers but that rely on a network of religious and community groups to deliver services. The Consortium does not receive any direct homeless assistance but relies on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Sec 8 emergency housing assistance.

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

Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for several people identified as being homeless in the Town. Amherst's Meals on Wheels Program has also stepped forward in these cases to provide daily meals. Community Development Block Grant funds may be made available to the Amherst Meals on Wheels program to provide healthy nutritious meals to the Town's identified homeless individuals or families if requested. The Five Year Consolidated Plan and the 2015 Action Plan goals do address assisting frail elderly and those at risk of homelessness.

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

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

Grant funds are available to assist victims of domestic violence in emergency situations through the Town of Amherst Family Offense Unit of the Police Department. Additional funds provide support through the YWCA for three units of Transitional Housing in the Town for families re-establishing themselves after the disruption of domestic violence.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Residential Rehabilitation - Owner Occupied	2015	2019	Affordable Housing		Residential Rehabilitation - Owner Occupied	CDBG: \$4,000,000 ESG: \$0	Homeowner Housing Rehabilitated: 100 Household Housing Unit
2	Residential Rehabilitation - Rental	2015	2019	Affordable Housing		Residential Rehabilitation - Rental	CDBG: \$375,000 ESG: \$0	Rental units rehabilitated: 15 Household Housing Unit
3	Public Infrastructure	2015	2019	Non-Housing Community Development		Public Infrastructure	CDBG: \$500,000 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
4	Public Facilities	2015	2019	Non-Housing Community Development		Public Facilities	CDBG: \$400,000 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
5	Neighborhood Revitalization	2015	2019	Affordable Housing Non-Housing Community Development		Neighborhood Revitalization	CDBG: \$500,000 ESG: \$0	Buildings Demolished: 8 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Public Services	2015	2019	Non-Housing Community Development		Public Services	CDBG: \$500,000 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
7	Housing Counseling	2015	2019	Affordable Housing		Housing Counseling	CDBG: \$40,000 ESG: \$0	Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
8	Disabled Persons Assistance	2015	2019	Affordable Housing Non-Homeless Special Needs		Provide Assistance to Disabled Persons	CDBG: \$50,000 ESG: \$0	Homeowner Housing Rehabilitated: 5 Household Housing Unit
9	Secure Affordable Housing	2015	2019	Affordable Housing		Provide Assistance to Secure Affordable Housing	CDBG: \$40,000	Direct Financial Assistance to Homebuyers: 5 Households Assisted
10	Weatherization Assistance	2015	2019	Affordable Housing		Provide Weatherization Assistance	CDBG: \$40,000 ESG: \$0	Homeowner Housing Rehabilitated: 200 Household Housing Unit
11	Code Enforcement	2015	2019	Non-Housing Community Development		Code Enforcement	CDBG: \$50,000	Housing Code Enforcement/Foreclosed Property Care: 300 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Homeless Assistance	2015	2019	Homeless		Provide Assistance to the Homeless	ESG: \$700,000	Tenant-based rental assistance / Rapid Rehousing: 60 Households Assisted Homeless Person Overnight Shelter: 50 Persons Assisted
13	Economic Development	2015	2019	Non-Housing Community Development		Economic Development	CDBG: \$1,250,000 ESG: \$0	Businesses assisted: 20 Businesses Assisted

Table 18 – Goals Summary

Goal Descriptions

1	Goal Name	Residential Rehabilitation - Owner Occupied
	Goal Description	A 0% interest, deferred payment loan will be provided to homeowners to repair their units to a standard condition. Upon completion, units will meet all housing codes and be lead-safe. Emergency repairs of existing units will be prioritized. The program will improve the living conditions and maintain property values in the Town's residential neighborhoods.
2	Goal Name	Residential Rehabilitation - Rental
	Goal Description	The Town and Village will both operate a Residential Rehabilitation – Rental program that will rehabilitate approximately 15 units of affordable rental housing in owner-occupied 2-unit structures.

3	Goal Name	Public Infrastructure
	Goal Description	There is a high demand for replacing aging infrastructure in Town. Most of the critical water infrastructure is over 50 years old and there are several hundred miles of local roads and sidewalks that require replacement. Most replacement projects will be done by Town employees while some other projects will be done through private contractors.
4	Goal Name	Public Facilities
	Goal Description	The Town and Village have several public facilities that were built prior to 1930 and are in need of further renovation. CDBG funds will be used for building renovations at the Sheridan-Parkside Community Center and the Town Boys & Girls Club.
5	Goal Name	Neighborhood Revitalization
	Goal Description	This program addresses vacant, substandard not-suitable for rehabilitation units in low to moderate income neighborhoods. Some properties will be acquired and demolished using CDBG funds. Subsequently, the lots will be sold for affordable housing development through the Town's Community Housing Development Organization.
6	Goal Name	Public Services
	Goal Description	The Sheridan-Parkside Youth Services Program (Prime Time) provides structured recreational activity for youth ages 6-18 during after school hours and also throughout the summer season. A Community Policing Program offers residents an opportunity to interact with police officers through neighborhood watch programs and neighborhood satellite police stations.
7	Goal Name	Housing Counseling
	Goal Description	The Town contracts with a HUD-certified housing counseling agency to provide one-on-one counseling with low-moderate income eligible residents with housing issues, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc...
8	Goal Name	Disabled Persons Assistance
	Goal Description	The Town will provide a 0% interest, deferred payment loan of up to \$5,000 for residents to make accessibility modifications to their home. Improvements may include accessible bathroom, kitchen, doorway, or ingress/egress modifications.

9	Goal Name	Secure Affordable Housing
	Goal Description	The Town will provide CDBG assistance to first-time homebuyers in the HOME First-Time Homebuyer Program - New Construction Program to afford the closing costs on their first home.
10	Goal Name	Weatherization Assistance
	Goal Description	The Town will contract with Supportive Services Corporation to provide energy audits for Town and Village residents. Any inefficiencies identified in the audit may be eligible for grant funded work items such as insulation, caulking, or newer energy-efficient appliances.
11	Goal Name	Code Enforcement
	Goal Description	The Town and Village will provide NYS Code Enforcement Officers in low-moderate income neighborhoods to identify and correct housing code violations in order to sustain a decent living condition for all those in the neighborhood.
12	Goal Name	Homeless Assistance
	Goal Description	The Town will coordinate with the Homeless Alliance of WNY in determining emergency shelters and homeless service agencies that will provide the best services for the local homeless population or those at-risk of becoming homeless.
13	Goal Name	Economic Development
	Goal Description	The Town will provide a low-interest loan of variable duration to microenterprises that are in need of working capital in sustaining their business operations within the Town. The Town will also provide low interest loans to assist businesses that promise to hire low-moderate income workers.

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 estimates that 15 households will qualify as Section 215 (2 Renter-Occupied & 13 Owner-Occupied) during FY 2015. Over the next five years (2015-2019), assuming continuation of similar funding levels the Town would expect to assist 75 households as Section 215 (15 Renter Occupied & 60 Owner-Occupied).

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

Addressing the emergency and transitional housing needs of homeless persons

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.

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

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

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

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

Child Lead Paint Poisoning Prevention Program

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

Healthy Neighborhoods Program

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

Awareness, Education, and Prevention

The Erie County Department of Health has several brochures on its lead poisoning prevention program, including phone numbers to call for information and assistance. In January 2009, the Community Foundation of Greater Buffalo was awarded a \$300,000 grant from HUD to undertake an outreach program to promote awareness, education and prevention for lead-based paint hazards. The outreach program is underway and includes billboard, radio, TV, and door-to-door initiatives along with sponsorship of various meetings.

Private LBP Hazard Remediation

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

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

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

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

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

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

Welfare Reform

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

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

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

Employment Programs

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

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

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

c.) BRIDGE: This program developed as a result of coordination between the Department of Social Services and the State University of New York (SUNY). SUNY operates the Educational Opportunity Center (EOC), which provides job training and educational preparation services to low- income individuals.

Interagency Initiatives

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

Family Preservation and Domestic Violence

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

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

Metropolitan/Regional Connections

Metropolitan/Regional Connections

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

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

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

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

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

SP-80 Monitoring - 91.230

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

The Town of Tonawanda receives federal entitlement CDBG, HOME, and ESG grants as well as program income from other NYS competitive grants (State Rental Rehab Program). Each funding source is managed so that the regulations are adhered to by the Town and its subrecipients.

The Town of Tonawanda enters into a three-year Cooperation Agreement with the Village of Kenmore in order to receive the federal CDBG grant. The current agreement that expires at the end of FY 2016 provides that the Town of Tonawanda Office of Community Development administer the CDBG and ESG grants for both municipalities.

The Town of Amherst manages the HOME funds through the Amherst-Cheektowaga-Tonawanda HOME Consortium, but the Town of Tonawanda manages its own HOME activities.

The Town also manages its own activities and monitors any activities undertaken by its subrecipients. Subrecipient agreements are entered into with the following agencies:

- Village of Kenmore
- Belmont Housing Resources of WNY for housing counseling and ESG related services.
- Supportive Services Corporation for weatherization of housing units.
- New Opportunities Community Housing Development Corporation (CHoDO) for housing construction.
- Catholic Charities for homelessness prevention services.

Each subrecipient is monitored for compliance on a quarterly basis through billing inspections and follow up phone or email communications. Once a year, the Director of Community Development and the CD Office Manager make site visits to inspect and monitor the terms of the subrecipient agreements.