

Town of Tonawanda

DRAFT

2020-2024 Consolidated Plan and

2020 Annual Action Plan

of the Five-Year Consolidated Plan

Community Development Block Grant,

Emergency Solutions Grant, and

HOME Investment Partnership Grant

Amherst-Cheektowaga-Tonawanda (ACT) Consortium

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

Contents

Executive Summary	1
ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)	1
The Process	6
PR-05 Lead & Responsible Agencies - 91.200(b)	6
PR-10 Consultation - 91.100, 91.200(b), 91.215(l)	7
PR-15 Citizen Participation - 91.401, 91.105, 91.200(c)	13
Needs Assessment	18
NA-05 Overview	18
NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)	21
NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)	25
Housing Market Analysis	27
MA-05 Overview	27
MA-30 Homeless Facilities and Services - 91.410, 91.210(c)	31
MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)	35
MA-50 Needs and Market Analysis Discussion	43
Strategic Plan	48
SP-05 Overview	48
SP-10 Geographic Priorities - 91.415, 91.215(a)(1)	50
SP-25 Priority Needs - 91.415, 91.215(a)(2)	56
SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)	63
SP-40 Institutional Delivery Structure - 91.415, 91.215(k)	66
SP-45 Goals - 91.415, 91.215(a)(4)	71
SP-60 Homelessness Strategy - 91.415, 91.215(d)	77
SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)	80
SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)	84
SP-80 Monitoring - 91.230	86
Annual Action Plan	87
AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)	87
AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)	91

AP-35 Projects - 91.420, 91.220(d)97
AP-38 Project Summary 100
AP-50 Geographic Distribution - 91.420, 91.220(f) 129
AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) 131
AP-85 Other Actions - 91.420, 91.220(k) 133
AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4) 137

Executive Summary

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

1. Introduction

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

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

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

Purpose of the Consolidated Plan

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

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

Focus of the Plan

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

Structure of the Plan

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

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 2020 Annual Plan includes the following activities: housing rehabilitation, public services, public facilities, public infrastructure, acquisition/demolition/disposition, 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 demand compared to other community development issues. There are no other government programs available 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).

The Town has also re-started a Microenterprise Loan Program to assist small businesses create and retain jobs in the community. It is intended that this program be continually funded with CDBG as interest rates rise and become more normalized after a decade at near zero percent. The program will offer a discount prime rate loan to eligible microenterprise business owners.

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 program performance in the face of staggering annual budget cuts including a 27% cut in CDBG and a 46% cut in HOME funding since 2010.

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 encouraged, as is the participation of all residents, including seniors, minorities, and persons with disabilities.

Citizen Participation Process

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

See above.

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	Amherst	Town of Amherst Community Development Department
CDBG Administrator	Tonawanda	Town of Tonawanda Planning and Development Department
ESG Administrator	Tonawanda	Town of Tonawanda Planning and Development Department

Table 1– Responsible Agencies

Narrative

The Town of Amherst Community Development Department is the lead agency for the preparation of the Five-Year Strategic Plan and administration of the HOME programs. The Towns of Cheektowaga and Tonawanda serve as Participating Grantees in the ACT HOME Consortium. It is anticipated that the Town of Tonawanda will receive an ESG entitlement grant directly from HUD in FY 2020.

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:

Kailee Van Brunt, AICP - Community Development Coordinator
Town of Tonawanda
169 Sheridan-Parkside Drive
Tonawanda, NY 14150
phone: (716) 871-8847 Ext. 7
email: kvanbrunt@tonawanda.ny.us

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

1. Introduction

The public participation process for the Five-Year Consolidated Plan and Analysis of Impediments to Fair Housing were designed as one single, extended outreach process. Although each process involved a distinct set of public meetings and stakeholder interviews, Tonawanda developed a coordinated outreach effort to maximize input from a large cross-section of stakeholders. A consultant was hired by the ACT Home Consortium to lead outreach initiatives primarily focused on stakeholder meetings and one-on-one and group interviews. Many housing, social service agencies, and other organizations serving Tonawanda were consulted during the development of this Consolidated Plan. They provided information and context that was invaluable to the planning process. Just like for all other CDBG-related activities, Tonawanda also strongly encouraged all known stakeholders to participate.

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 housing authorities, non-for-profit service providers, non-profit and for-profit housing developers and social service agencies. 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 various organizations and service providers on rehabilitation and other affordable housing projects.

In addition, the Town of Cheektowaga has coordinated with the Towns of Amherst and Tonawanda in the planning and implementation of the Consolidated Plan. These three towns cooperate on initiatives extensively due to their participation in the ACT HOME Consortium. The Town has also worked with Erie County in the implementation of the Consolidated Plan.

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. Few 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 (HAWNY) 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.

The Town of Tonawanda Office of Planning and Development collaborates with the HAWNY throughout the federal grant program process. The Town understands the importance of coordinating the area's limited resources to address the problem of homelessness. We discuss how best to meet the ESG regulatory framework and address the needs of the homeless population especially those that need rapid re-housing assistance.

During the development of the Town's 5-Year Consolidated Plan, HAWNY was a significant data source for defining the homelessness issues in WNY and sharing their views on how the ESG program funding fits into the equation for providing solutions to this ongoing issue.

The Town coordinates its "Request for Proposal" process for homeless service agency funding with HAWNY and will establish a separate contract with HAWNY to provide HMIS licensing and training to all of the ESG subrecipient organizations to ensure data quality measures are achieved.

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's Office of Planning and Development collaborates with HAWNY during the Request for Proposals process to allocate the ESG funds efficiently and effectively. HAWNY maintains the area's HMIS system and has established performance standards for homeless service agency programs. The Town plans to use a portion of any ESG allocation to assist HAWNY and participating homeless service agencies with HMIS training and evaluation.

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

The Community Development Department actively consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the Town and better allocate entitlement resources. Stakeholder meetings were held with public housing authorities, CBOs and CHDOs, regional agencies, health and human services on June 24, 2019, affordable special needs housing and homeless assistance providers on June 26, 2019, and Planning and Zoning and Municipal Officials on August 1, 2019. During the preparation of the Consolidated Plan, the ACT Consortium consulted with many entities, including the following:

- Amherst Senior Services & Outreach
- Amherst Youth & Recreation
- Belmont Housing Resources

- BestSelf Behavioral Health
- Big Brothers Big Sisters
- Bissonette House
- Broadway Filmore NHS
- Buffalo Erie Niagara Land Improvement Corporation
- Buffalo Niagara Association of Realtors
- Buffalo Niagara Partnership
- Catholic Charities of Buffalo
- Cazenovia Recovery Systems
- CCS of Buffalo
- Cheektowaga Community Collaborative
- Cheektowaga Youth & Recreation
- Child and Family Services
- Compass House
- Empire State Development
- Erie County Department of Environment and Planning
- Erie County Department of Health, Office of Environmental Health
- Erie County Department of Mental Health
- Erie County Department of Senior Services
- Erie County Department of Social Services
- Erie County Office for People with Disabilities
- Evergreen Health Services
- FLARE Inc.
- Habitat for Humanity
- Homeless Alliance of WNY
- Lackawanna Community Development Corp.
- Lackawanna Municipal Housing Authority
- My Place Home for Homeless
- Neighbor Legal Services
- New Life Residential Center
- Norstar Development
- Northwest Buffalo Community Center
- NYS Department of Transportation
- People Inc.
- Rental Assistance Corporation
- Restoration Society, Inc.
- Rural Transit Service
- Salvation Army
- Saving Grace Ministries
- Southtowns Rural Preservation Co.

- Town of Hamburg Community Development
- Towns of Amherst, Cheektowaga, Tonawanda
- Tonawanda Housing Authority
- United Way of Buffalo & Erie County
- USDA Rural Development
- West Side NHS
- WNY Independent Living
- Workforce Innovations Board

Table 2– Agencies, groups, organizations who participated

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

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2019 Tonawanda Annual Action Plan	Town of Tonawanda	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG, ESG, and HOME investments
2018 Town of Tonawanda Consolidated Annual Performance Evaluation Report	Town of Tonawanda	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG, ESG, and HOME investments
2017 Tonawanda Tomorrow: Growing the Town’s Economic Future	Town of Tonawanda	Strategic Plan goals and priorities were developed to be consistent with the Town’s economic action plan focused on economy workforce and placemaking
2017 Tonawanda Opportunity Area Plan	Town of Tonawanda	The Strategic Plan goals and priorities were developed to align with the recommended redevelopment projects

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2014 Town of Tonawanda Comprehensive Plan Update	Town of Tonawanda	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Tonawanda
2011 Town of Tonawanda Economic Development Strategy	Town of Tonawanda Development Corporation	The Strategic Plan's economic development strategy is designed to align with and complement the EDS at the local level
2009 Old Town Neighborhood Plan	Town of Tonawanda	The Strategic Plan is consistent with the Goals of the Old Town Redevelopment Plan
2008 Town of Tonawanda LWRP	Town of Tonawanda	The Strategic Plan has been prepared consistent with the waterfront revitalization program policies
2003 Sheridan Parkside Village Courts Revitalization Plan	Town of Tonawanda	The Strategic Plan goals and priorities were developed to align with the goals and objectives of the neighborhood plan
2019 Draft Analysis of Impediments to Fair Housing Choice	ACT Consortium, Erie County Consortium	The current goals and strategies to overcome current barriers to fair housing are drawn from this plan
2016 Erie County Comprehensive Economic Development Strategy Update	Erie County Industrial Development Agency	The Strategic Plan's economic development strategy is designed to align with and complement the CEDS at the local level
2018 Homelessness Summary Brief	Homeless Alliance of Western New York	The Strategic Plan's homelessness strategy was developed consistent with the data presented within
Mid-Term Review for "Opening Doors": A Community Ten Year Plan to End Homelessness update for Erie, Genesee, Niagara, Orleans and Wyoming Counties	Homeless Alliance of Western New York	The Strategic Plan's homelessness strategy is consistent with the Continuum of Care recommendations

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.

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

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

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

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

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

A formal public comment period to solicit the views of citizens, public agencies and other interested parties on possible projects and goals to address housing and community development needs extended from September 25, 2019 to November 20, 2019. A public hearing was held on October 21, 2019 to accept comments. The hearing was advertised in the Ken-Ton Bee and posted on Tonawanda's website.

The formal public comment period on the Draft 2020-2024 Consolidated Plan, Draft 2020 Annual Action Plan, and Draft Analysis of Impediments to Fair Housing Choice extended from December 13, 2019 to January 15, 2020. A public meeting was held on January 14, 2020 to accept and review comments on the drafts. The meeting was advertised in the Ken-Ton Bee and posted on Tonawanda's website.

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 Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Stakeholder Meeting	Public Housing Authorities	A stakeholder meeting was held on June 24, 2019 at 9:00 am at the Delavan Grider Community Center. Representatives of five agencies attended.	Access to public transportation is a must for anyone with Section 8 voucher. Concentration of Section 8 vouchers in small areas of suburbs. Complaints include problem tenants, garbage, maintenance, etc. Language barriers can be a problem. Affordability and availability add to fair housing problem. Need more awareness of Rental Registry with landlords and municipalities. Lack of supply of affordable housing.	All comments were accepted.	
2	Stakeholder Meeting	CBOs/CHDOs	A stakeholder meeting was held on June 24, 2019 at 11:00 am at the Delavan Grider Community Center. Representatives of 15 agencies attended.	Issues with landlords include absentee landlords and zombie properties; failure to maintain properties; refusal to accept Section 8 vouchers. Community resistance to affordable housing persists. There is a need to educate landlords & tenants about fair housing. Difficulty in reaching target population, especially immigrants (language barrier). Inconsistent code enforcement by municipalities is a problem. Affordable housing is an issue in the City and suburbs.	All comments were accepted.	

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

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
5	Stakeholder Meeting	Affordable Special Needs Housing	A stakeholder meeting was held on June 26, 2019 at 9 am at the Belle Center. Eleven agency representatives attended.	Ability of agencies to acquire properties for rehab has been impacted by rising acquisition costs. Rising property values and resulting increases in tax burden have made it difficult for low-mod people to access housing market and for existing homeowners to keep homes. People above poverty line are not eligible for assistance. Attracting homebuyers with mixed incomes helps stabilize neighborhoods. Resistance to affordable housing persists.	All comments were accepted.	
6	Stakeholder Meeting	Homeless Assistance Providers	A stakeholder meeting was held on June 26, 2019 at 11 am at the Belle Center. Eleven agency representatives attended.	Persons discharged from prison, many of whom are seniors who have had lengthy incarcerations, often have nowhere to go and need housing and support services. Discharge into homelessness is a concern. There is a critical need for affordable housing, particularly for single males and single mothers with children. Concern about equal access and discrimination against LGBTQ populations. Need for social services assistance and crisis housing for youth.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
7	Public Hearing	Non-targeted/broad community	The Town of Tonawanda held a public hearing on October 21, 2019 during the Town Board meeting to provide information on estimated amount of CDBG, ESG, and HOME funds available and to obtain views of citizens on housing and community development needs. Many citizens attended the hearing.	While no one commented during the public hearing, one person called several days later in response to the request for comments. They expressed their support of the Sheridan Parkside Village Neighborhood Plan. They are particularly interested in the creation of the library. They would like to see infill installation of new homes on Town owned vacant lots. They would like additional street lighting and a larger protective gap between the roadway and sidewalk.	All comments were accepted.	
8	Newspaper Ad	All community residents	Notice of availability of the FY 2020-FY 2024 Consolidated Plan and the FY 2020 Annual Action Plan for public review and comment was published in the Ken-Ton Bee on 12/11/19 and on the Town's website.	TBD		
9	Public Hearing	Non-targeted/broad community	The Town of Tonawanda held a public meeting on January 14, 2020 to review and accept comments on the Draft FY 2020-FY 2024 Consolidated Plan and the FY 2020 Annual Action Plan. Attendance TBD.	TBD		

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Amherst-Cheektowaga-Tonawanda HOME Consortium is comprised of three towns with total population of 285,049. Amherst is the largest of the three towns, representing 43.5% of the Consortium followed by Cheektowaga, 30.8%, and Tonawanda, 25.7%. As shown in the table below, the percentage distribution for owner and renter occupied units is somewhat similar to the population distribution among the towns. In each of the towns, renter occupied units represent 29-30% of all occupied units in each town.

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

Table 5– Population and Owner/Renter Units

Source: 2011-2015 ACS

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. Data in this section was drawn primarily from HUD’s Comprehensive Housing Affordability Strategy (CHAS) data set (2012-2016), which is a special tabulation of American Community Survey (ACS) data from the Census Bureau. CPD Maps were created to show the geographic distribution and concentration of cost burdened households based on the most recent CHAS data.

Housing Cost Burden

Cost burden is categorized by “HUD Adjusted Median Family Income”, or HAMFI, which refers to the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs. HUD defines housing cost burden as paying more than 30% of household income for housing.

The following map shows the percentage of low-income households that are cost burdened by census tract. Census Tract 83, bordered by the Niagara River, Interstate 190, Sheridan Drive, and Military Road, contains both a high concentration of cost-burdened households (54%) and a high poverty rate (37%). The tract with the next highest concentration of cost-burdened households (35%) covers the central portion of the Village of Kenmore.

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

Introduction:

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

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

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

Table 6– Households and Persons Homeless

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

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

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

Town of Amherst							
Zip Codes	14051	14068	14221	14226	14228	Total	
Count	4	3	24	27	13	71	
Town of Cheektowaga							
Zip Codes	14206*	14211*	14215*	14225	14227	14043	Total
Count	137	440	609	58	36	18	1,298
Note: Zip codes 14206, 14211 and 14215 are shared with the City of Buffalo. For those zip codes unique to Cheektowaga, a total of 112 individuals were reported as experiencing homelessness.							
Town of Tonawanda							
Zip Codes	14150	14217	14207*	14223		Total	
Count	93	42	251	31		417	
Note: Zip code 14207 is shared with the City of Buffalo. For those zip codes unique to Tonawanda, a total of 166 individuals were reported as experiencing homelessness.							

Table 7– Number Reported Homeless
Source: Homeless Alliance of Western New York

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

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

- According to the 2019 Point-in-Time Count (PIT), there were 31 chronically homeless individuals, none of which were children. Seventeen of the chronically homeless individuals were in emergency shelters, 11 were in a Safe Haven arrangement, and 3 were unsheltered.
- There were 54 unaccompanied youth according to the PIT, 52 of whom were sheltered, with two unsheltered, and 11 of whom were under age 18.
- There were 74 homeless veterans. Thirty-two were in emergency shelters, 38 were in transitional housing, 3 were in a Safe Haven arrangement, and one was unsheltered. All the homeless veterans counted were single-person households.

There are a range of situations that contribute to homelessness, including physical disabilities, mental health challenges, substance abuse, chronic health conditions, and/or domestic violence. According to the Erie County PIT, 150 adults had a serious mental illness, 74 adults had a substance use disorder, six adults had HIV/AIDS, and 135 adults were survivors of domestic violence.

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

Table 8– Additional Homeless Populations

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

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

There is no data available on these groups in Amherst, Cheektowaga or Tonawanda, nor the number of days that a person typically remains homeless in these communities.

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

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

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

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

Table 9– Race Homeless Populations

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

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

Table 10– Ethnicity of Homeless Populations

Source: Homeless Alliance of Western New York – Point in Time Count 1/23/2019

Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, Wyoming Counties CoC

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

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

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

Town	Zip	Count
City and Town of Tonawanda	14150	73
City of Buffalo and Town of Tonawanda	14207*	251
Town of Tonawanda	14217	27
Town of Tonawanda	14223	31
Total		382

Table 11– Tonawanda Homeless Populations
Note: Zip code 14207 is shared with the City of Buffalo.
Source: Homeless Alliance of Western New York, 2019

As the data shows, there are 382 homeless persons being served in the four 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 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. Town Department Heads, the Town Board, and the Village of Kenmore also submitted activities to be considered for future funding years. 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 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.

Town Department Heads, the Town Board, and the Village of Kenmore also submitted activities to be considered for future funding years. 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, crime awareness activities, and childcare 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 in which it requested feedback on needs across the community. Ongoing assessments of existing services will determine when additional services will be provided. Town Department Heads, the Town Board, and the Village of Kenmore also submitted activities to be considered for future funding years. Needs are also identified through examination of the towns' comprehensive land use plans, neighborhood plans, and capital improvement programs.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

According to Zillow, the median price of home sales within the Town of Tonawanda has experienced a significant 35% increase from \$111,000 in 2015 to \$149,400 in 2019. In comparison, since 2016, the median price of home sales within Erie County has experienced a significant 24% increase from \$135,000 in 2015 to \$166,900 during the first nine months of 2019. To some degree, these increases correlate with a significant decline in the inventory of homes available for sale from about 6,000 in 2015 to an average of about 3,000 in 2019 in Erie County.

Fifty three percent of homeowners with a mortgage in the Town of Tonawanda are paying less than 20% of their income towards housing costs. A total of 11,587 out 14,435 homeowners are within the recommended guideline of paying no more than 30% of income on housing costs.

Percent of Income	Number	Number
Less than 20.0%	7,619	52.8%
20.0 to 24.9%	2,447	17.0%
25.0 to 29.9%	1,521	10.5%
30.0 to 34.9%	625	4.3%
35.0% or more	2,223	15.4%
Total	14,435	100.0%

Table 12– Housing Cost for Homeowners with Mortgage

Source: 2011-2015 ACS

The estimated 2015 median contract rent in Tonawanda was \$633 and median gross rent was \$753. By comparison, these rents are about \$200 cheaper than those identified in the Town of Amherst.

Rent Range	Contract Rent		Gross Rent	
	Number	Percent	Number	Percent
Less than \$500	1,748	19.6%	1,035	11.6%
\$500-999	6,806	76.3%	6,853	76.9%
\$1,000-1,499	320	3.6%	946	10.6%
\$1,500-1,999	42	0.5%	82	0.9%
\$2,000-2,499	0	0.0%	0	0.0%
\$2,500-2,999	0	0.0%	0	0.0%
\$3,000 or more	0	0.0%	0	0.0%
Total	8,916	100.0%	8,916	100.0%
Median rent	\$633		\$753	

Table 13– Contract and Gross Rent
Source: 2011-2015 ACS

The mix of housing type within the Town of Tonawanda is predominantly single family with more than 93% falling under this category for owner occupied units. For renters, 31% are in two-unit properties, 28% in three to nine-unit properties, and 24% in properties with more than 10 units.

Category	Owner		Renter	
	Number	Percent	Number	Percent
1-detached	21,417	92.1%	1,285	13.6%
1-attached	358	1.5%	261	2.8%
2	1,281	5.5%	2,916	30.8%
3 or 4	41	0.2%	955	10.1%
5 to 9	6	0.0%	1,721	18.2%
10 to 19	0	0.0%	884	9.3%
20 to 49	0	0.0%	305	3.2%
50 or more	10	0.0%	1,123	11.9%
Mobile Home, RV	135	0.6%	25	0.3%
Total	23,248	100.0%	9,475	100.0%

Table 14– Number of Units in Structure
Source: 2011-2015 ACS

The Town on Tonawanda’s home rehabilitation program provides deferred loans. From 2015-2018 the program rehabbed a total of 112 owner occupied units, 51 of which, had lead-based paint hazards, and 53 were occupied by seniors. Eleven percent of the units rehabbed were within target areas.

Rehabilitation Category	Tonawanda
Total units rehabbed	112
Total rehabbed units built before 1978	112
Rehabbed Units with LBP hazard	51
Pre-1978 units % rehabbed with LBP Hazard	46%
Units rehabbed within target areas	12
Percent units rehabbed within target areas	11%
Rehabbed units occupied by seniors	53
Percent rehabbed units occupied by seniors	47%

Table 15– Units Rehabilitated under Consolidated Plan 2015-2018

Tonawanda is a community of neighborhoods with individual housing assets and needs. Tonawanda Tomorrow: Growing the Town’s Economic Future (2017) states that residential real estate in Tonawanda remains a good investment with low vacancy rates and modestly sized affordable mid-century homes. Vacancy rates in Tonawanda (3.2%) are half of what they are in the Buffalo Niagara Region (6.2%). The housing stock is also older, and smaller by comparison. According to the US Census, ACS, 1-year estimates in 2015, homeownership rates among young adults under 35 is 52% in Tonawanda, and 36% in the Buffalo Niagara Region.

The Town of Tonawanda is characterized by numerous neighborhoods, each having a particular image and sense of identity. The Village of Kenmore helps contribute to local identity, offering an atmosphere of densely populated traditional neighborhoods with a walkable retail business district that serves the wider Tonawanda region.

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.

Broadband Access

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

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

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

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

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

Introduction

Stakeholders interviewed revealed that poverty is a leading cause of homelessness in the ACT Consortium, and that there are high numbers of persons living in poverty in the ACT Consortium. However, because poverty is not as concentrated as in the nearby City of Buffalo, it is often less noticeable. No homeless shelters are located within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium. Community Development staff in the Consortium's towns have participated in the Prism Project Forum and Point in Time Count to survey the homeless and help to create a data base of services utilized by the chronically homeless. These projects, sponsored by the Homeless Alliance of Western New York, have produced a Ten-Year Action Plan (Opening Doors: Buffalo and Erie County Plan to End Homelessness (2012)) for the broader Erie County community. Among the priorities it sets for the community are permanent housing for the chronically homeless and permanent housing for clients dealing with mental health and/or substance abuse issues. The 2016 update to the Opening Doors document identifies other trends affecting rural homelessness including high levels of poverty, the distance between low-cost housing and employment opportunities, transportation, lack of affordable housing, and fewer homeless shelters than their urban counterparts.

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 few 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.

The Salvation Army Rehabilitation Shelter is a 79-bed transitional housing facility for homeless men with substance abuse issues located at 1080 Military Road in Tonawanda.

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

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

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

operates a “Wheels to Work” program which grants small loans for the purchase of a vehicle. The Wheels to Work program has been highly successful and to date has made hundreds of loans providing individuals the opportunity to access employment by providing transportation to jobs off regular bus routes and during public transportation off hours.

Physical and mental health care providers in the area include:

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

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

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

- Buffalo Employment Training Service
- Buffalo General Hospital
- Buffalo Opportunity Services
- Buffalo Urban League Answer Program

- Buffalo Urban League Employment Program
- Buffalo Urban League Multi-Service Center
- Educational Opportunity Center
- Employment and Service Center
- Everywoman Opportunity Centers
- Greater Buffalo Works Program
- Veterans Multi-Purpose
- Vocational and Educational Services for Individuals with Disabilities
- Vocational Training Center
- Workforce Investment Board

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

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

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

Facilities provide specialized assistance to chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, but many service providers work with multiple homeless subpopulations rather than one specific population. Police departments in the Consortium and administrators of hospital emergency rooms work together to identify the homeless,

assess their needs, and refer them to appropriate agencies. Within the Consortium there are a number of facilities that meet the needs of homeless persons.

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

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

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

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

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

MA-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

As of 2019, economic indicators suggest that the Town of Tonawanda may be performing slightly ahead of Erie County as a whole, New York State, and the nation. The unemployment rate in the Town in September 2019 was 3.4%, compared to Erie County’s rate of 3.9%, the State unemployment of 3.7%, and the national unemployment rate of 3.6%. Unemployment in the Town hit a high annual average in 2009 (7.6%) but has been declining steadily over the past ten years. Tonawanda has also experienced a growth in the total number of jobs. The number of jobs reflected in the table below (26,284) represents an increase of 7.24% over the number of jobs in the Town reflected in the 2006-2010 ACS. Job growth was spread across industry sectors, with only Education and Health Care Services and Wholesale Trade experiencing a decline in the number of jobs as compared to the prior five-year period. Education and Health Care Services remains the top business sector employing Tonawanda residents, followed by Retail Trade and Arts, Entertainment, Accommodations. Unlike other first-ring suburbs, Tonawanda has long been a center of industry, and manufacturing continues to be a significant source of jobs. Partially in response to the closing of the NRG Huntley coal-fired power plant, the Town adopted “Tonawanda Tomorrow”, an economic action plan, in 2017, which includes among its strategies positioning Tonawanda as a regional center for sustainable manufacturing and trade.

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	37	0	0	0	0
Arts, Entertainment, Accommodations	4,093	2,652	13	9	-4
Construction	1,116	1,840	3	6	3
Education and Health Care Services	6,139	4,416	19	15	-4
Finance, Insurance, and Real Estate	2,929	1,368	9	5	-4
Information	694	517	2	2	0
Manufacturing	3,046	5,778	9	19	10
Other Services	1,611	1,497	5	5	0
Professional, Scientific, Management Services	3,384	1,161	10	4	-7

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Public Administration	0	0	0	0	0
Retail Trade	4,220	3,001	13	10	-3
Transportation and Warehousing	1,135	2,724	4	9	6
Wholesale Trade	1,461	1,330	5	4	0
Total	29,865	26,284	--	--	--

Table 16 - Business Activity

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

Labor Force

Total Population in the Civilian Labor Force	39,985
Civilian Employed Population 16 years and over	38,300
Unemployment Rate	4.22
Unemployment Rate for Ages 16-24	16.45
Unemployment Rate for Ages 25-65	2.74

Table 17 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	8,845
Farming, fisheries and forestry occupations	1,870
Service	3,450
Sales and office	11,255
Construction, extraction, maintenance and repair	2,310
Production, transportation and material moving	1,630

Table 18 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	30,530	83%
30-59 Minutes	5,210	14%
60 or More Minutes	1,015	3%
Total	36,755	100%

Table 19 - Travel Time

Data Source: 2011-2015 ACS

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	880	25	850
High school graduate (includes equivalency)	6,595	260	2,200
Some college or Associate's degree	11,075	460	2,585
Bachelor's degree or higher	12,685	340	1,565

Table 20 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	18	140	140	270	630
9th to 12th grade, no diploma	395	295	240	665	1,375
High school graduate, GED, or alternative	1,750	1,550	1,795	5,710	5,340
Some college, no degree	2,270	2,190	1,440	5,050	2,720
Associate's degree	275	1,255	1,245	2,965	890
Bachelor's degree	1,115	2,745	1,695	3,695	1,605
Graduate or professional degree	120	2,335	1,645	2,490	1,385

Table 21 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	38,818
High school graduate (includes equivalency)	60,180
Some college or Associate's degree	71,749
Bachelor's degree	88,667
Graduate or professional degree	103,998

Table 22 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The Education and Health Care Services sector employs the largest number of workers, which represents 19% of employed residents, followed by Arts, Entertainment, Accommodations and the Retail Trade sector which each employ 13% of Township residents, and Professional, Scientific, Management Services which employ 10% of residents. Nine percent of residents are employed in the Manufacturing sector.

Describe the workforce and infrastructure needs of the business community:

As with the Buffalo Niagara Region as a whole, the educational attainment of the labor force in the Town of Tonawanda is steadily improving, experiencing growth in those with Some College or an Associate's Degree and Bachelor's Degree or Higher, while the number of those with a High School diploma or equivalent and those who have not completed high school account for a lower number of the workforce. Notwithstanding this trend, the need for skills development, particularly for workers without any College education, is still a pressing need. In its "Tonawanda Tomorrow" plan, the Town has identified the following workforce needs: (1) address barriers to work faced by some Town residents, such as limited mobility and access to employment training; (2) address the difficulty faced by local businesses in finding qualified workers by aligning training curricula with industry needs (including "soft skills" development) and by strengthening the career pipeline for students to access jobs in Tonawanda; and (3) help businesses address the problem of an aging workforce (particularly in key industries such as manufacturing, construction, and trade and transportation) including encouraging mentoring and training of younger workers.

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

Numerous stakeholders also brought up transportation as a significant need for job seekers and a barrier to employment, particularly for low-income shift workers or others with atypical work hours. While commute time is not an issue for workers in the Town of Tonawanda, with 83% commuting less than 30 minutes, stakeholders' interviews cited transportation for low-income residents who do not have cars as being a major obstacle for them to obtain and keep jobs, and to access job training and employment related services.

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

On a regional level, implementation of New York State’s Buffalo Billion Plan has had a significant impact over the Buffalo Niagara Region in terms of both creating economic opportunity and improving the workforce development infrastructure. The Town of Tonawanda is in a state of transition due to the permanent decommissioning of the NRG Huntley coal-fired power plant which occurred in March 2016. Although the NRG plant was not a significant employer in the Town, the closure had a significant impact on the Town’s industrial tax base, with tax revenue to the County, Town and School District generated by the plant falling from nearly \$6 million to just \$515,000.¹ This loss of revenue will be partially mitigated through New York State’s Electric Generation Facility Cessation Mitigation program, which will provide financial support to the taxing jurisdictions over a seven-year term to help bridge budget shortfalls. The closure served as a catalyst for the “Tonawanda Tomorrow” action plan, which charts a path to a cleaner, greener and more innovative and sustainable economy and which seeks to address challenges to the Town’s economic base and workforce needs. While dealing with the closure of the Huntley plant, the Town also seeks to capitalize on investments by large industrial employers such as Sumitomo Rubber USA and General Motors Tonawanda Powertrain. A well- trained workforce which possesses the skills needed for advanced manufacturing is critical to retaining these major employers and attracting businesses to the Town.

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

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

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

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

¹ <https://buffalonews.com/2019/08/05/owner-of-former-huntley-plant-sets-low-value-on-property-4>

assistance, GED preparation, a state of the art resource center, supportive services, and financial aid. Erie Community College also participates in the WorkSourceOne initiative as a one-stop shop for these resources. WorkSourceOne operates four Affiliate Career Service Centers: two in Williamsville, one in Buffalo, and one in Orchard Park. These centers are accessible to residents of all communities in the Consortium, including Tonawanda.

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

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

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

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

Yes

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

In 2016, the Erie County Industrial Development Agency finalized a five-year update of a CEDS that was adopted in 2011 and that encompasses all of Erie County. The 2016 CEDS considered the findings and strategic initiatives derived from recent regional planning and economic development efforts, including the Western New York Regional Economic Development Council (WNYREDC) Strategy for Prosperity in Western New York and One Region Forward – A New Way to Plan for Buffalo Niagara. These planning efforts include among their primary strategic principles the preparation of a stronger workforce,

through, among other actions, expanding training and apprenticeship programs (and making them more inclusive), aligning skills training with the current and future job market, and promoting better connections between schools and job readiness.

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

In 2014, the Town of Tonawanda adopted an update to its Comprehensive Plan (which was adopted in 2005). The goals and objectives adopted in the update are as follows: (1) Maintain the safety, high quality of life, public health and sustainability of our community; (2) Support the preservation of environmental resources and the continued remediation of former waste sites; (3) Maintain and enhance the vitality of neighborhoods and neighborhood centers, and retain a diverse stock of residential properties that meet the needs of all residents; (4) Promote smart, sustainable and well-planned economic development opportunities; (5) Promote a safe and efficient multi-modal transportation system; (6) Ensure coordinated, high quality, well-maintained and cost effective facilities and services that are required by residents and businesses in a sustainable community; and (7) Enhance the efficiency and efficacy of Town government and planning and strive to improve interaction with other communities and agencies.

In 2017, with funding provided by the United States Economic Development Administration, the Town adopted “Tonawanda Tomorrow”, an economic action plan which incorporated strategies for the economy, workforce, and placemaking, to create a sustainable economy. Specific strategies include positioning the Town as a regional center for sustainable manufacturing and trade, creating a local workforce network focused on the needs of Tonawanda workers and businesses, and revising the Town’s zoning code to emphasize walkability, diverse transportation options, and mixed-use development.

EnVision Centers

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

The Consolidated Plan stakeholder meetings elicited feedback from representatives of Public Housing Authorities, Industrial Development Agencies, Economic Development Agencies, and other Non-Profit Corporations serving a variety of Consortium needs. Stakeholder efforts align directly with Envision Center Goals in the area of expanding economic opportunity and in closing the skills gap that exists

between many residents of HUD-assisted housing and the jobs available in and around Consortium communities. The existing service networks and ongoing economic growth and workforce development initiatives create an excellent environment for a future Bricks and Mortar EnVision Center.

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

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

	Number	Percent
Substandard Housing		
Occupied Housing Units	32,965	
Lacking complete kitchen facilities	674	2.04%
Lacking complete plumbing facilities	113	0.34%
Occupants per Room		
1.00 or Less	32,701	
1.01 to 1.50 (Overcrowded)	177	0.54%
1.51 or more (Severe Overcrowded)	87	0.26%

Table 23– Housing Problems in Tonawanda
Source: 2011-2015 ACS

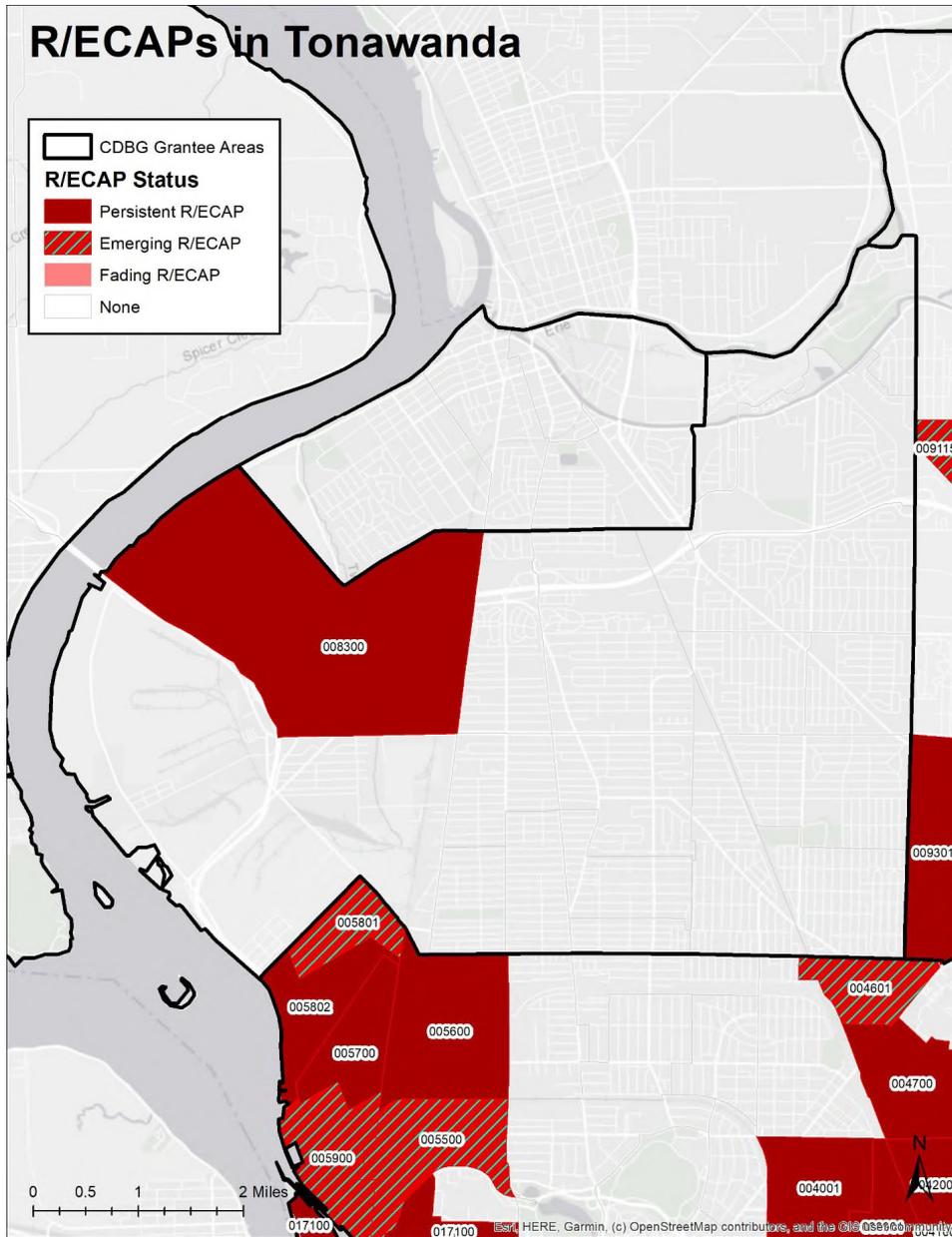
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

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

The census tract listed below have been identified as concentrated areas of racial and ethnic minorities and low-income populations. The tract is located in the northwest area of the Town that borders the City of Tonawanda. Observe that, since the 2009-13 ACS, the data from which are used by HUD in its AFFTH0004a dataset, the non-White share of population in the tract more than doubled, and the poverty rate has ticked up by nearly three percentage points.

Tract ID	Population	% Non-White	Poverty Rate
008300	2,265	46.7%	36.0%

Table 24– Town of Cheektowaga - Racially or Ethnically Concentrated Areas of Poverty
Source: 2013-17 U.S. Census, ACS, Analysis of Impediments to Fair Housing Choice (2019)



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.

According to HUD CPD data the median home value in Census Tract 83 is \$74,800 and the median contract rent is \$468. Median household income is \$20,460 and the poverty rate is greater than 37%. Nearly 80% of the housing units are renter occupied and the vacancy rate is six percent.

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. The Town may need to rely on the private market to purchase and develop temporarily stored properties within the Sheridan Parkside neighborhood.

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.

The Sheridan Parkside Life Center on Pyle Court is an adult life skills training community center and church. They currently offer free laundry services and will hopefully be funding construction of a healthy kitchen.

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, 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?

The Tonawanda Opportunity Area Plan identified redevelopment projects that, if implemented, will provide catalytic economic development impacts for the entire Tonawanda Opportunity Area and the Town overall. To that end the Town focused on four Strategic Areas that will be catalytic for the area and could also provide shovel ready sites for developers and other investors:

- The Mile View Strategic Area includes properties between the City of Tonawanda and the River View Technology Park. The primary goals of this Strategic Area were to provide better internal road and multi-modal access, build on the success of the Riverview Solar Technology Park, and to provide better access from the "mile strip" parcels to the Niagara River.

- The United Strategic area primarily includes waterfront and interior lands owned by United Refining Corporation that are significantly underutilized. It is directly north of Interstate 190 and the Grand Island Bridges.
- The Niagara River World/Cherry Farm/INS area includes one of the largest sections of waterfront in Tonawanda and redevelopment of the sites would increase access to the waterfront while providing an improved gateway into the southern portion of the TOA.
- The Huntley/Sawyer area includes the recently shuttered Huntley Power Plant and the Sawyer Avenue industrial area. While redevelopment of the Huntley Plant will take time, it is a key strategic site for future development as are multiple parcels on Sawyer Avenue.

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

Strategic Plan

SP-05 Overview

Strategic Plan Overview

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

Assisting income eligible homeowners remains a priority for the Consortium. The Town of Tonawanda will continue to use CDBG resources to fund its Residential Rehabilitation Program to address the severe demand for home repairs to maintain its aging housing stock. Issues to be addressed include leaking roofs, and heating, plumbing, electrical, and foundation wall repairs. In addition to home repairs, access improvements, such as wheelchair ramps and doorway modifications and modifications to kitchens and bathrooms, are also eligible work items for physically disabled persons in low- and moderate- income households.

Priorities

In Tonawanda, owner-occupied housing rehabilitation activities will be focused in older neighborhoods across the Town and in the Village of Kenmore. In addition, infrastructure improvements, including sidewalk and curb ramp replacement/improvement, street resurfacing, and water and sewer line lining, repair and replacement, will also be undertaken with CDBG fund in income-eligible neighborhoods. Neighborhood revitalization efforts, including the acquisition and rehabilitation of vacant, substandard structures, and, where appropriate, the demolition of structures and storage of properties until affordable housing can be built, will be focused in the Sheridan-Parkside, Old Town, and Lincoln Park neighborhoods. Investments in public facilities will be directed toward developing and maintaining community assets in order to preserve and enhance services and quality of life.

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, Transportation for Seniors

Influence of Market Conditions

The Town of Tonawanda had identified among its broad planning goals maintaining the safety, high quality of life, public health and sustainability of its community, and maintaining and enhancing the vitality of its neighborhoods and neighborhood centers, and retaining a diverse stock of residential properties that meet the needs of all residents. This plan identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. 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. Faced with funding constraints, The Town may need to rely increasingly on the private market for the redevelopment of temporarily stored sites.

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

Geographic Area

1	Area Name:	Old Town
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	82.5%
	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 420 living units, of which about 15% are not suitable for rehabilitation and can be considered uninhabitable. There are approximately 170 rental units and 250 owner-occupied units. 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 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 while some of the more costly infrastructure investments remain.
Identify the needs in this target area.	The ACS data shows that the population's low-moderate income rate is approximately 82.5%. 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 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.
	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, 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.
2	Area Name:	Sheridan-Parkside
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	83% to 91%
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	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>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 240 vacant substandard housing units and built 37 new affordable single-family homes in Sheridan-Parkside. 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. Funding is being allocated to support a Healthy Kitchen/Life Center to serve area residents and teach techniques for cooking healthy food on a budget.</p>
<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>A Neighborhood Redevelopment Plan was completed in 2003 and adopted as part of the Town's Comprehensive Plan in 2005. Several ambitious action items identified in the plan continue to be implemented as funding allows.</p>
<p>Identify the needs in this target area.</p>	<p>The ACS data shows a low-mod percentage of approximately 83% to 91%. 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>
<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 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.</p>

3	Area Name:	Lincoln Park
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	43% to 55%
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Lincoln Park Neighborhood is the second largest and second most populous of the low-moderate income neighborhoods in Tonawanda. It is located in the Southeast section of the Town just South of Sheridan Drive. It consists of Census Tract 80.01, B.G. 3 and 5.
	Include specific housing and commercial characteristics of this target area.	The neighborhood consists of about 2,200 persons, of which about 48% are considered low-moderate income. There is a higher proportion of rental units in this neighborhood (36%) than the Town average (27%). The neighborhood is served by some limited commercial retail located along Lincoln Park Blvd, 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 meets monthly and 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 48%. 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:	53% to 65%
	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 central and north central sections of the Village that are designated low-moderate income would receive targeted funding. The HUD eligible areas consist of CT 86 B.G. 5; CT 87 B.G. 1; and C.T. 87 B.G. 4.
	Include specific housing and commercial characteristics of this target area.	The eligible neighborhoods consist of about 1,985 persons, of which 57% are considered low-moderate income. There is a higher proportion of rental units in these neighborhoods (54%) than the Town overall (27%). The residential vacancy rate in these neighborhoods (8%) is somewhat elevated from the Town's average (6%). The neighborhoods are served by commercial retail located along Delaware Avenue and Elmwood Avenue. There are several public facilities including educational buildings, government offices, 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 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>Identify the needs in this target area.</p>	<p>The ACS data shows that the population’s low-moderate income rate ranges from 53% to 65% depending on the specific census block group. The biggest issues in the neighborhoods 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 projects and the construction of additional decent affordable housing.</p>

Table 25 - Geographic Priority Areas

General Allocation Priorities

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

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

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

Priority Needs

1	Priority Need Name	Residential Rehabilitation - Owner Occupied
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly
	Geographic Areas Affected	Townwide
	Associated Goals	Residential Rehabilitation - Owner Occupied
	Description	The Town of Tonawanda (and Village of Kenmore) 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 occupied housing units, 80% of which are over 60 years of age. With a low-moderate income population of 36%, 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.
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	CDBG Income Eligible Neighborhoods
	Associated Goals	Public Infrastructure
	Description	The Town (and Village) intend to fund several infrastructure projects over the next five years within low-moderate income neighborhoods including sidewalk and curb ramp replacement/improvement, street resurfacing, water and sewer line lining/repair/replacement, etc.

	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	Sheridan-Parkside Old Town Lincoln Park
	Associated Goals	Neighborhood Revitalization
	Description	The Town will use its CDBG, HOME, and other resources to acquire and rehabilitate vacant, substandard structures. Subsequently, the homes will be sold through the Town's Community Housing Development Organization (CHDO). Other properties will be acquired, demolished, and temporarily stored until a new, high quality affordable housing unit may be built on or a modular housing unit may be placed on the property by either the Town's CHDO or a private developer. Some of the properties may be used for other neighborhood improvements such as road connections, or recreational areas depending on its specific location.
	Basis for Relative Priority	Vacant, substandard housing has been cited by neighborhood citizens as a rising concern throughout the course of the last 15 years. It is the desire of neighborhood residents that the Town provide sufficient resources to deal with any vacant, 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	Townwide
	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. The Town seeks to actively promote economic opportunities for low- and moderate-income persons who are traditionally denied conventional bank loans and other financial opportunities.
5	Priority Need Name	Housing Counseling
	Priority Level	High
	Population	Extremely Low, Low, Moderate, Large Families, Families with Children, Elderly, Public Housing Residents, Individuals, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities
	Geographic Areas Affected	Townwide
	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	Townwide
	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 over the next 5 years. 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	Townwide
	Associated Goals	Disabled Persons Assistance
	Description	The Town will provide a 0% interest, deferred payment loan for residents to make accessibility modifications to their home. Improvements may include accessible bathroom, kitchen, doorway, or ingress/egress modifications.
	Basis for Relative Priority	The Town and Village demographics have shown a higher than average low-moderate income senior population that would rather age in place in their communities than move into a higher density living environment. Also, more wartime veterans are returning home with life altering injuries that need assistance in gaining independent living.
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	Townwide
	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	High
	Population	Extremely Low, Low, Moderate
	Geographic Areas Affected	
	Associated Goals	Public Facilities
	Description	The Town will be using CDBG resources to invest in public facilities to benefit low- and moderate-income neighborhoods in the form of physical improvements or through programming such as the creation of the Life Center Healthy Kitchen in the Sheridan Parkside neighborhood.
	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	Townwide
	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 33,000 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. A Senior Van Transportation Program provides subsidized rides for seniors to locations both within and outside of the Town. The Town and Village will consider funding other public service programs as the opportunities present themselves.
Basis for Relative Priority	Public safety, senior transportation, and providing structured recreational activities for at-risk neighborhood youth were identified by residents of the Town through neighborhood planning activities.

Table 26 – Priority Needs Summary

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

Introduction

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,651,069	404,500	1,651,069	3,706,638	8,222,276	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	141,286	0	141,286	282,572	565,144	

Table 27 - 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 \$400,000 annually in 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.

The ESG funding must be matched \$1 for \$1 by the service agencies or subrecipients.

There is a focus in the coming years on utilizing CDBG resources to supplement and leverage funding from other programs. Specifically, CDBG funding is committed as part of the required match to the Parker Boulevard Complete Streets Pilot Project that has received approximately \$924,000 in funding through the New York State Department of Transportation's (NYSDOT) Congestion Mitigation and Air Quality program. The NYSDOT has also agreed to provide \$315,140 towards the Pedestrian Safety Action Plan project. CDBG funds will be used to close the funding gap for that project. The Town and Village will continue to utilize CDBG funding to leverage funding from other programs as the opportunities present themselves.

If appropriate, describe publicly 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 numerous 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 was acquired when the Town has used 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.

Due to drastic cuts in HOME funding, the Town's First-Time Homebuyer Program - New Construction Program is not as active as was anticipated when writing the local neighborhood plans for Old Town and Sheridan Parkside. As such, these plans will need revisiting in the future. The Town may need to rely on the private market to purchase and develop the temporarily stored properties.

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
TOWN OF CHEEKTOWAGA	Government	Ownership Rental	Jurisdiction
TOWN OF 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 28 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

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

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

- 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 expressed concern about meeting the HUD requirements regarding development experience and organizational capacity, while still remaining financially viable with current funding levels. 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. Belmont Housing Resources and New Opportunities have recently stepped into the role of developing affordable housing within the Consortium, supported by HOME funding, and could help to fill the CHDO gap moving forward.

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

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

Table 29 - 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, and Niagara Frontier Vocational Training Center.

Healthcare-The Erie County Health Department's Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies 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 Section 8 emergency housing assistance.

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

The Town of Tonawanda Office of Planning and Development collaborates with the HAWNY throughout the federal grant program process. The Town understands the importance of coordinating the area's limited resources to address the problem of homelessness. We discuss how best to meet the ESG regulatory framework and address the needs of the homeless population especially those that need rapid re-housing assistance.

During the development of the Town's 5-Year Consolidated Plan, HAWNY was a significant data source for defining the homelessness issues in WNY and sharing their views on how the ESG program funding fits into the equation for providing solutions to this ongoing issue.

The Town coordinates its "Request for Proposal" process for homeless service agency funding with HAWNY and will establish a separate contract with HAWNY to provide HMIS licensing and training to all of the ESG subrecipient organizations to ensure data quality measures are achieved.

HAWNY utilizes HUD's Housing First approach, which is intended to eliminate barriers to permanent housing without preconditions such as sobriety, treatment, or service participation requirements. According to the Homeless Alliance Executive Director, the new approach is proving effective in getting people into housing, regardless of services they need or are receiving.

While the housing crisis remains significant, the Homeless Alliance has been able to reduce both the chronically homeless and the number of homeless in shelters. The Alliance uses the Single Point of Access, a mental health referral system, to submit medical, hospitalization, treatment and housing information and to connect that information to the various service providers. The Restoration Society's Rapid Re-Housing Program is also focused on meeting housing needs through the Single Point of Access (SPOA) and Coordinated Entry processes in Erie County, as well as Tonawanda's Emergency Solution's Grant. Individuals are empowered to find affordable, independent housing within Tonawanda and Erie County as a whole.

The Ken-Ton School District Family Support Center provides family counseling to address non-academic barriers to learning for students. Through their model, the entire family is incorporated into counseling and support to address all facets of what may be affecting the student's academic progress. The Family Support Center is often a first stop for families in need and provides counseling services for school district families and staff while also connecting clients with countless resources in the community.

Lastly, the Sheridan Parkside Community Center is the home to services that include Ken-Ton Meals on Wheels who deliver over 85,000 meals per year and the Sheridan Parkside Youth Services Program (Prime Time) that provides structured recreational activity for youth ages 6-18 during after school hours and also throughout the summer season.

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	2020	2024	Affordable Housing		Residential Rehabilitation - Owner Occupied	CDBG: \$2,000,000 ESG: \$0 HOME: \$1,625,000	Homeowner Housing Rehabilitated: 100 Household Housing Units
2	Residential Rehabilitation - Rental	2020	2024	Affordable Housing		Residential Rehabilitation - Rental	CDBG: 185,000 ESG: \$0 HOME: \$0	Rental units rehabilitated: 15 Household Housing Units
3	Public Infrastructure	2020	2024	Non-Housing Community Development		Public Infrastructure	CDBG: \$2,600,000 ESG: \$0 HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4,000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Facilities	2020	2024	Non-Housing Community Development		Public Facilities	CDBG: \$1,500,000 ESG: \$0 HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,500 Persons Assisted
5	Neighborhood Revitalization	2020	2024	Affordable Housing Non-Housing Community Development		Neighborhood Revitalization	CDBG: \$195,000 ESG: \$0 HOME: \$100,000	Acquisition/Rehabilitations: 1 Building Acquisition/Demolitions: 4 Buildings
6	Public Services	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$550,000 ESG: \$0 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 5,000 Persons Assisted
7	Housing Counseling	2020	2024	Affordable Housing		Housing Counseling	CDBG: \$40,000 ESG: \$0 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 400 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Disabled Persons Assistance	2020	2024	Affordable Housing Non-Homeless Special Needs		Provide Assistance to Disabled Persons	CDBG: \$25,000 ESG: \$0 HOME: \$0	Homeowner Housing Rehabilitated: 5 Household Housing Unit
9	Secure Affordable Housing	2020	2024	Affordable Housing		Provide Assistance to Secure Affordable Housing	CDBG: \$0 ESG: \$0 HOME: \$100,000	Direct Financial Assistance to Homebuyers: 20 Households Assisted
10	Weatherization Assistance	2020	2024	Affordable Housing		Provide Weatherization Assistance	CDBG: \$40,000 ESG: \$0 HOME: \$0	Homeowner Housing Rehabilitated: 100 Household Housing Unit
11	Code Enforcement	2020	2024	Non-Housing Community Development		Code Enforcement	CDBG: \$50,000 ESG: \$0 HOME: \$0	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	2020	2024	Homeless		Provide Assistance to the Homeless	CDBG: \$0 ESG: \$700,000 HOME: \$0	Tenant-based rental assistance / Rapid Rehousing: 60 Households Assisted Homeless Person Overnight Shelter: 50 Persons Assisted
13	Economic Development	2020	2024	Non-Housing Community Development		Economic Development	CDBG: \$50,000 ESG: \$0 HOME: \$0	Businesses assisted: 2 Businesses Assisted

Table 30 – 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 and Village'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 the Town and Village. 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. Many replacement projects will be done by Town or Village 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 also be used to support the creation of the Life Center Healthy Kitchen in the Sheridan Parkside Neighborhood.
5	Goal Name	Neighborhood Revitalization
	Goal Description	This program addresses vacant, substandard units in low to moderate income neighborhoods. Some properties will be acquired and rehabilitated using CDBG, HOME, and other funds. Subsequently, the homes will be sold through the Town's Community Housing Development Organization (CHDO). Other properties will be acquired, demolished, and temporarily stored until a new, high quality affordable housing unit may be built on or a modular housing unit may be placed on the property by either the Town's CHDO or a private developer. Some of the property may be used for other neighborhood improvements such as road connections, or recreational areas depending on its specific location.
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. The Town will also utilize CDBG resources to support Senior Van Transportation Services.
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 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. As a separate program, the Town will provide HOME funded assistance to first-time homebuyers 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 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.

Table 31 – Goal Descriptions

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

The Town estimates that 15 households will qualify as Section 215 (2 Renter-Occupied & 13 Owner-Occupied) during FY 2020. Over the next five years (2020-2024), assuming continuation of similar funding levels the Town would expect to assist 75 households as Section 215 (10 Renter Occupied & 65 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

Although homelessness is not perceived as a significant problem in the ACT Consortium towns, the Consortium is committed to helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living. The Consortium supports the efforts of HAWNY as the Collaborative Applicant of the Continuum of Care (CoC) and the designated CoC agency for Erie County. As such, it is responsible for compiling the annual Continuum of Care grant from the Department of Housing and Urban Development (HUD).

Persons who are homeless have access to the various elements of the CoC 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 CoC. 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 CoC.

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.

The Town of Tonawanda reaches homeless persons through Police Department interaction, through the personnel at Kenmore Mercy Hospital, and through the Ken-Ton School District. Information is provided to those agencies that provide contact information for homeless services agencies in WNY including the Town's ESG subrecipient agencies.

Addressing the emergency and transitional housing needs of homeless persons

The Town of Tonawanda receives approximately \$140,000 in ESG funding annually. The Town contracts with homeless service agencies throughout the region through an RFP process. The Town has historically not placed any geographical restrictions on the use of this ESG funding on the area's homeless service providers. These resources have been used to assist homeless persons in Amherst, Cheektowaga, Tonawanda, and the City of Buffalo. The Town of Tonawanda works with the Homeless Alliance of WNY to make sure that the funds are being used to further the goals of the Region's Plan to End Homelessness and to make sure area agencies are using the new written standards and coordinated entry and assessment systems.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The Town has placed an emphasis on awarding funds to rapid re-housing programs and homelessness prevention programs that focus on keeping homeless persons out of shelters for extended periods of time. It's important to safely house the homeless quickly and be able to follow up with needed stabilization and support services.

Utilizing Emergency Solutions Grant funding, a total of 61 clients, 49 of which were single adults, experienced homelessness in Tonawanda during the 2018 Program Year. Greater than 50% of these clients were assisted at emergency shelters. The next highest percentage is 15% from street outreach/in-reach. The three top reasons why clients were homeless were household disputes (not DV) at 14.75%, loss of job/income 13.11% and domestic violence 11.48%. In total, 199 clients were served by the Compass House Emergency Shelter, a frequent subrecipient of Tonawanda ESG funding.

The ACT Consortium will maintain coordination and collaboration with local non-profit agencies serving the homeless population and will continue to use its CDBG and ESG funds to assist non-profit organizations that serve homeless individuals and families in the region. Each year, the Homeless Alliance has made progress towards ending chronic homelessness, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

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

The Town has placed an emphasis on awarding funds to rapid re-housing programs and homelessness prevention programs that focus on keeping homeless persons out of shelters for extended periods of time. The Town provides contact information of area homeless services agencies to public and private systems of care agencies that may be discharging low-income individuals and families.

The Town of Tonawanda continues to utilize the Emergency Solutions Grant Program to assist homeless, and individuals and families at risk of becoming homeless. During the 2018 Program Year the Town funded shelter operations at the Compass House, Rapid Re-Housing and Homeless Prevention Programs

at Restoration Society, and data collection and reporting through HAWNY. In 2018 the Compass House reportedly served 199 clients in their emergency shelter. It is anticipated that funding for the 2019 Program Year will be largely consistent with 2018.

The HAWNY has developed a strategic plan for implementation of its homelessness prevention goals. Strategic plan goals include: 1) Prevent homelessness by increasing access to mainstream benefits to low income households; 2) Implement Housing First strategies; 3) Develop adequate supply of permanent affordable housing that includes permanent supportive housing units that target the chronically homeless; 4) Prioritize homeless outreach services that consistently engage chronically homeless; 5) Monitor system discharge protocols to ensure that persons are not being routinely discharged to homelessness; 6) Reduce the length of stay of homeless households in the homeless system by implementing rapid re-housing programs; 7) Reduce repeat episodes of homelessness; 8) Develop and implement a coordinated entry system to ensure that homeless households are referred to programs that will best meet their needs and ensure that those with the highest needs are prioritized.

According to HAWNY's Mid-Term Review for Opening Doors: a Community Ten Year Plan to End Homelessness (2016), there has been an improvement in overall data quality that has been collected on the homeless population in the Western New York area and for family and youth homelessness in particular. However, people experiencing homelessness and how they access services differ considerably from one community to another; services are frequently difficult to access in rural areas in particular, people travel greater distances to access them. The characteristics and needs of family experiencing homelessness are also different, but poverty, affordable housing, domestic violence and livable wages are the principal causes of family homelessness, according to the National Center on Family homelessness.

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

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

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

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

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

NYS Lead Based Paint Prevention Program

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

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

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

Healthy Neighborhood Program

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

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

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

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

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

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

LEADSAFE Erie County Lead Hazard Control Program

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

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

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

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

Child Lead Poisoning Primary Prevention Program.

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

Erie County Child Lead Poisoning Primary Prevention Program

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

Removal, Remodel, Painters Program (RRP)

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

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

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

Awareness, Education, and Prevention

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

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

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

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

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

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

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

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

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

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

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

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

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

The Town of Tonawanda recognizes that housing programs by themselves will not eliminate or reduce poverty. Subsidized programs such as those targeted in the Consolidated Plan can free up cash resources for living necessities, but these programs alone cannot raise a household above the poverty level. Where appropriate and feasible, the town will coordinate their housing programs with services designed to assist low income households to break the cycle of poverty.

The Erie County Public Housing Authority has established an Action Plan for the Family Self-Sufficiency Program. This program provides rent subsidies to eligible households in concert with other social services and programs on terms that encourage personal responsibility leading to financial independence.

Fundamentally, a sound and growing economy is one of the most critical factors in helping to reduce poverty. The town has engaged in various initiatives and programs to promote business, jobs, and training. The Town of Tonawanda Business Incentive Fund Loan Program offers loans to companies which will create jobs, a majority of which will be offered to low-moderate income persons.

The Town of Tonawanda Empire Zone made the creation of jobs more attractive; no property tax, payroll tax, or sales tax on the purchase of equipment is required to be paid. The Empire Zone rules require that residents of Sheridan Parkside Village Courts receive special consideration when a company in the Empire Zone is hiring. The companies that have located in the zone will continue to receive benefits for 1-10 years depending on their initial start date in the zone.

The Town is also proactively planning and investing in infrastructure in two new business parks at the North Youngman Commerce Center and the Riverview Solar Technology Park that contain a total of 150 acres of “shovel-ready” land for redevelopment. Both projects benefited from the Empire Zone designation and will hopefully remain part of any successor program that New York State develops. Training and employment opportunities that are available to low and moderate-income persons through the NYS Labor Department and the local Workforce Development Board include those for:

- Economically disadvantaged adults who need training and job skills to secure employment;
- Dislocated workers who are also economically disadvantaged and have been laid off and are waiting to be recalled to the same or similar occupation (e.g., a steel worker); and
- Summer jobs for youth who are from low- and moderate-income families along with on-the-job education classes for the duration of their job.

Employment opportunities may be available for Community Development projects under the Section 3 requirement. Section 3 provides for preference to be given to a contractor who meets requirements for Section 3 certification by agreeing to hire low-income town residents for that project.

The Town will continue to advise residents of employment opportunities and economic development in the Town of Tonawanda through the official newspaper, the Ken-Ton Bee, and through their official website at <http://www.tonawanda.ny.us>.

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

The Town of Tonawanda, NY has an affordable housing stock when compared both nationally and regionally. The median sale price for a home is around \$149,400. The monthly rent for a 1 or 2-bedroom apartment is in the range of \$700-\$800. The Town uses its Residential Rehabilitation Program to keep low-moderate income families in their existing homes. The Town is also in the process of updating its zoning code to remove barriers for more accessible housing units. Several multi-family housing projects that target the senior citizen population are currently being planned and will most likely qualify for the LIHTC program.

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 received federal entitlement CDBG, HOME, and ESG grants. 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 Town of Tonawanda Office of Planning and Development administers the CDBG and ESG grants for both municipalities.

The Town of Amherst manages the HOME program 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 for WNY for housing counseling services
- Supportive Services Corporation for weatherization of housing units

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

Annual Action Plan

Expected Resources

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

Introduction

The Town of Tonawanda is expecting to receive approximately \$1,651,069 in CDBG funds from the U.S. Department of Housing and Urban Development and \$240,000 in HOME funding through the Amherst-Cheektowaga-Tonawanda HOME Consortium. Existing home sales have remained steady over the last year, and the Town is anticipating approximately \$350,000 of program income from the CDBG Residential Rehabilitation Program revolving loan fund and approximately \$120,000 of program income from the HOME Residential Rehabilitation Program revolving loan fund. The Village of Kenmore is expected to receive approximately \$50,000 of program income from their CDBG loan portfolio. The Microenterprise Revolving Loan Fund is expected to generate \$4,500 in program income. The Town of Tonawanda is also expecting to receive approximately \$141,286 in ESG funds. Other grant sources are constantly being sought to supplement the federal HUD programs. See the next section which describes additional funding sources including a \$924,000 NYSDOT CMAQ grant for a complete streets project and a NYSDOT investment of \$315,140 in a pedestrian safety project. The Town has also received a Zombie Home Grant Program (round 2) in the

amount of \$275,000.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	Estimated 1,651,069	Estimated 404,500	1,651,069	Estimated 3,706,638	Estimated 8,222,276 (includes program income)	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	Estimated 141,286	0	141,286	Estimated 282,572	Estimated 565,144	

Table 32 - Expected Resources – Priority Table

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

A large portion of the federal CDBG resources will be used in the Town's and Village's Residential Rehabilitation Programs 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. These revolving loan funds provide approximately \$400,000 annually in 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.

The ESG funding must be matched \$1 for \$1 by the service agencies or subrecipients.

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 cleanup 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 the Town's 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 very important to pool any available resources to make a successful project.

Considering the Town's proposed CDBG projects to be funded in fiscal year 2020, two will be leveraging additional funding sources. The Parker Boulevard Improvements project has been awarded a \$924,000 NYSDOT CMAQ grant. CDBG funds will be used for the 25% match for the CMAQ grant. The NYSDOT has also agreed to provide \$315,140 towards the Pedestrian Safety Action Plan project. CDBG funds will be used to close the funding gap for that project.

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

The Town of Tonawanda has numerous parcels of land temporarily banked for use in the Town's First-Time Homebuyer Program – New Construction 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 geographic location in the neighborhood plan.

Due to drastic cuts in HOME funding, the Town's First-Time Homebuyer Program - New Construction Program is not as active as was anticipated when writing the local neighborhood plans for Old Town and Sheridan Parkside. As such, these plans will need revisiting in the future. The Town may need to rely on the private market to purchase and develop the temporarily stored properties.

Discussion

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Residential Rehabilitation - Owner Occupied	2020	2023	Affordable Housing	Townwide	Residential Rehabilitation - Owner Occupied	CDBG: \$577,000 ESG: \$0 HOME: \$240,000 Includes PI	Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Residential Rehabilitation - Rental	2020	2023	Affordable Housing	Townwide	Residential Rehabilitation - Rental	CDBG: \$100,000 ESG: \$0 HOME: \$0 Includes PI	Rental units rehabilitated: 4 Household Housing Unit
3	Public Infrastructure	2020	2023	Non-Housing Community Development	CDBG Income Eligible Neighborhoods	Public Infrastructure	CDBG: \$917,816 ESG: \$0 HOME: \$0 Includes PI	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
4	Public Facilities	2020	2023	Non-Housing Community Development		Public Facilities	CDBG: \$16,400 ESG: \$0 HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2365 Persons Assisted
5	Neighborhood Revitalization	2020	2023	Affordable Housing Non-Housing Community Development	Sheridan-Parkside Old Town Lincoln Park	Neighborhood Revitalization	CDBG: \$39,000 ESG: \$0 HOME:\$100,000	Buildings Demolished: 2 Buildings Acquisition/Rehab: 1 Building
6	Public Services	2020	2023	Non-Housing Community Development		Public Services	CDBG: \$110,435 ESG: \$0 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted

7	Housing Counseling	2020	2023	Affordable Housing	Townwide	Housing Counseling	CDBG: \$8,000 ESG: \$0 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 80 Households Assisted
8	Disabled Persons Assistance	2020	2023	Affordable Housing Non-Homeless Special Needs	Townwide	Provide Assistance to Disabled Persons	CDBG: \$2,000 ESG: \$0 HOME: \$0	Homeowner Housing Rehabilitated: 1 Household Housing Unit
9	Secure Affordable Housing	2020	2023	Affordable Housing	Townwide	Provide Assistance to Secure Affordable Housing	CDBG: \$0 ESG: \$0 HOME: \$20,000	Direct Financial Assistance to Homebuyers: 4 Households Assisted
10	Weatherization Assistance	2020	2023	Affordable Housing	Townwide	Provide Weatherization Assistance	CDBG: \$8,200 ESG: \$0 HOME: \$20,000	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
11	Code Enforcement	2020	2023	Non-Housing Community Development	Sheridan-Parkside Old Town Lincoln Park Village of Kenmore	Code Enforcement	CDBG: \$57,780 ESG: \$0 HOME: \$0	Housing Code Enforcement/Foreclosed Property Care: 60 Household Housing Unit
12	Homeless Assistance	2020	2023	Homeless		Provide Assistance to the Homeless	CDBG: \$0 ESG: \$141,286 HOME: \$0	Tenant-based rental assistance / Rapid Rehousing: 7 Households Assisted Homelessness Prevention: 15 Persons Assisted

13	Economic Development	2020	2023	Non-Housing Community Development	Townwide	Economic Development	CDBG: \$11,000 ESG: \$0 HOME: \$0 Includes PI	Businesses assisted: 1 Businesses Assisted
----	----------------------	------	------	-----------------------------------	----------	----------------------	--	---

Table 33 – 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 and Village'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 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 the Town and Village. 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. Many replacement projects will be done by Town or Village 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 also be used to support the creation of the Life Center Healthy Kitchen in the Sheridan Parkside Neighborhood.

5	Goal Name	Neighborhood Revitalization
	Goal Description	This program addresses vacant, substandard units in low to moderate income neighborhoods. Some properties will be acquired and rehabilitated using CDBG, HOME, and other funds. Subsequently, the homes will be sold through the Town's Community Housing Development Organization (CHDO). Other properties will be acquired, demolished, and temporarily stored until a new, high quality affordable housing unit may be built on or a modular housing unit may be placed on the property by either the Town's CHDO or a private developer. Some of the properties may be used for other neighborhood improvements such as road connections, or recreational areas depending on its specific location.
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. The Town will also utilize CDBG resources to support Senior Van Transportation Services.
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 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. As a separate program, the Town will provide HOME funded assistance to first-time homebuyers 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 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.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Town has been addressing its community development objectives by operating several programs on a year to year basis. The Town's Home Repair Program that began in 1978 is still addressing low to moderate income homeowner's repair needs today. Other projects such as neighborhood revitalization plans require longer periods of time to address the goals and objectives that have been formulated in the adopted neighborhood plans.

The Town's Acquisition & Demolition Program addresses vacant substandard structures and is a critical element to some neighborhood revitalization plans. Most of these revitalization efforts were started in the mid 1990's and coincide with the Town's First-Time Homebuyer - New Construction Program. Other CDBG funding is reserved for public facility and infrastructure projects that have been programmed in the Town's Capital Improvement Program.

The Town's Crime Awareness Program remains in high demand by local residents living in low to moderate income neighborhoods and within the Village of Kenmore. Also, a neighborhood youth services program operated in the Sheridan-Parkside Community Center is witnessing an all-time high in attendance and provides structured recreational activities for children ages 6-18. Both programs have been identified in local revitalization plans as high priorities. The Town's Senior Transportation Program has also experienced a substantial increase in ridership following the addition of a new van and subsidized trip costs.

The following projects have been identified as having partial to full pre-award costs: Street Resurfacing (\$16,316); Parker Boulevard Complete Street Pilot Project (\$252,500); Pedestrian Safety Action Plan Base Bid (\$160,000); Water/Sewer Improvements (\$285,000); Sheridan-Parkside Healthy Kitchen; and

the Town's Crime Resistance Program (\$16,400).

#	Project Name
1	CODE ENFORCEMENT - TOWN
2	ACQUISITION - SHERIDAN-PARKSIDE
3	ACQUISITION - APPRAISALS
4	DEMOLITION - SHERIDAN-PARKSIDE
5	DEMOLITION - TOWN-WIDE (SPOT BASIS)
6	DISPOSITION - SHERIDAN-PARKSIDE
7	DISPOSITION - OLD TOWN
8	DISPOSITION - KENILWORTH
9	DISPOSITION - CONTRACTUAL SERVICES
10	RESIDENTIAL REHABILITATION - TOWN (Single-Unit)
11	RESIDENTIAL REHABILITATION - TOWN (Multi-Unit)
12	HANDICAPPED ACCESSIBILITY - FREEDOM PROGRAM
13	LEAD BASED PAINT IMPLEMENTATION
14	RESIDENTIAL REHABILITATION ADMINISTRATION
15	HOME PROGRAM DELIVERY
16	STREET RESURFACING - TOWN HIGHWAY
17	PARKER BOULEVARD IMPROVEMENTS
18	PEDESTRIAN SAFETY ACTION PLAN
19	WATER/SEWER IMPROVEMENTS
20	SHERIDAN-PARKSIDE HEALTHY KITCHEN - LIFE CENTER
21	MICROENTERPRISE LOAN PROGRAM
22	CRIME RESISTANCE PROGRAM
23	SENIOR TRANSPORTATION SERVICE
24	YOUTH SERVICES - PRIME TIME PROGRAM
25	GENERAL ADMINISTRATION
26	HOUSING COUNSELING
27	WEATHERIZATION PROGRAM
28	VILLAGE - RESIDENTIAL REHABILITATION (SINGLE-UNIT)
29	VILLAGE - RESIDENTIAL REHAB ADMINISTRATION
30	VILLAGE - CODE ENFORCEMENT
31	VILLAGE - LBP IMPLEMENTATION
32	VILLAGE - STREET RESURFACING
33	VILLAGE - SIDEWALK REPLACEMENT
34	VILLAGE - SANITARY SEWER REPLACEMENT
35	VILLAGE - COMMUNITY POLICING
36	ESG – SHELTER
37	ESG – HOMELESS PREVENTION
38	ESG – RAPID RE-HOUSING
39	ESG – DATA COLLECTION
40	ESG - ADMINISTRATION

Table 34 – Project Information

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

The Town has had to focus its limited federal resources on housing and neighborhood revitalization programs due to a 73% reduction in CDBG funding since 1978 (when considering inflation). The public has identified keeping private residences maintained properly in neighborhoods as a high priority through the comprehensive planning process. There also are no other programs at the state or federal levels that address comprehensive home repair.

The Town will also be continuing to fund its neighborhood revitalization program consisting of acquisition and demolition funding to address any vacant, substandard structures that become eyesores that may affect neighborhood values.

Infrastructure spending is needed to maintain the expected level of service in transportation and other utility service. The Town's unmet need for infrastructure funding is over \$300M to address all of the issues related to water and sewer alone.

The Town will also continue to use its Emergency Solutions Grant to coordinate with area social service agencies to provide community supports for the Town's most needy homeless population. The Town's CDBG allocation will continue to fund a housing counseling program and a weatherization program to help those homeowners who are struggling financially.

AP-38 Project Summary

Project Summary Information

1	Project Name	CODE ENFORCEMENT - TOWN
	Target Area	Sheridan-Parkside Old Town Lincoln Park
	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$51,780
	Description	The Town of Tonawanda Office of Planning and Development employs 2 full-time and 2 part-time NYS certified code enforcement officers to conduct code inspections of residential properties within the low-moderate income census tract block groups of the Town. Property owners who have outstanding code violations will be issued a citation and corrective action will be ensured through the appropriate judicial process.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 8,595 persons living in low-mod income eligible block groups (outside of the Village of Kenmore).
	Location Description	All low-moderate income eligible C.T. B.G.s in Town.
	Planned Activities	The Town intends to enforce NYS Property Maintenance Code and local land use law in low-mod income eligible block groups
2	Project Name	ACQUISITION - SHERIDAN-PARKSIDE
	Target Area	Sheridan-Parkside
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization

	Funding	CDBG: \$1,000
	Description	The Town will acquire substandard vacant properties in the Sheridan-Parkside Neighborhood. The properties will then be surveyed for asbestos containing materials and demolished by a local contractor. The land will be remediated and landbanked for use in accordance with the neighborhood plan. Most of the property will be used in the Town's First-Time Homebuyer Program, but other property may be used to enhance the neighborhood street connections or recreational opportunities.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,265 residents, approximately 87% of which are low-moderate income. About 34% live below the federal poverty line. There are 525 single-parent households in the Sheridan-Parkside Neighborhood.
	Location Description	C.T. 83 - B.G. 1,2,3 Sheridan-Parkside Neighborhood
	Planned Activities	The Town will acquire vacant, substandard structures.
3	Project Name	ACQUISITION - APPRAISALS
	Target Area	n/a
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$1,000
	Description	The Town will contract with an appraisal company to provide market value appraisals in conjunction with the acquisition of vacant, substandard structures.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	Likely within target neighborhoods such as Sheridan-Parkside, Old Town, and Lincoln Park
	Planned Activities	The Town will contract with an appraisal company on a case by case basis as needed.

4	Project Name	DEMOLITION - SHERIDAN-PARKSIDE
	Target Area	Sheridan-Parkside
	Goals Supported	Neighborhood Revitalization Economic Development
	Needs Addressed	Neighborhood Revitalization Economic Development
	Funding	CDBG: \$1,000
	Description	The Town will demolish substandard, vacant structures in the Sheridan-Parkside Neighborhood.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,060 Low-Moderate Income Persons
	Location Description	C.T. 83 B.G. 1,2,3 Sheridan-Parkside Neighborhood
	Planned Activities	The Town will plan to demolish vacant, substandard structures should any be acquired.
5	Project Name	DEMOLITION - TOWN-WIDE (SPOT BASIS)
	Target Area	n/a
	Goals Supported	Neighborhood Revitalization Economic Development
	Needs Addressed	Neighborhood Revitalization Economic Development
	Funding	CDBG: \$1,000
	Description	The Town intends to demolish severely dilapidated, vacant properties in low-moderate income census tract black groups.
	Target Date	3/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	2,500 persons
	Location Description	Low-moderate income eligible neighborhoods
	Planned Activities	The Town estimates that 2 vacant, substandard structures will be demolished during FY 2020, largely utilizing prior award money.
6	Project Name	DISPOSITION SHERIDAN-PARKSIDE
	Target Area	Sheridan-Parkside
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$2,600
	Description	The Town is anticipating temporary carrying costs of property acquired and demolished for the First-Time Homebuyer Program and the Sheridan-Parkside Redevelopment Plan. These costs will include taxes. The town currently is holding approximately 78 parcels for future use in accordance with the neighborhood plan.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,365 residents of Sheridan-Parkside of which 2,060 are low-mod income persons
	Location Description	C.T. 83 B.G. 1,2,3 Sheridan-Parkside Neighborhood
	Planned Activities	The Town intends to pay tax bills on property that it is temporarily holding for future affordable housing development
7	Project Name	DISPOSITION - OLD TOWN
	Target Area	Old Town
	Goals Supported	Neighborhood Revitalization

	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$300
	Description	The Town will pay for temporary holding costs associated with 9 parcels in the Old Town Neighborhood that are being held for use in the Town's First-Time Homebuyer Program and in accordance with the Old Town Neighborhood Plan. These costs will include taxes.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,000 residents of Old Town of which 825 are low-mod income persons
	Location Description	C.T. 84, B.G. 3 Old Town Neighborhood
	Planned Activities	The Town intends to pay tax bills on property that it is temporarily holding for future affordable housing development
8	Project Name	DISPOSITION - KENILWORTH
	Target Area	Kenilworth
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$100
	Description	The Town will pay for temporary holding costs associated with 4 parcels in low-mod income areas of the Kenilworth Neighborhood that are being held for use in the Town's First-Time Homebuyer Program. These costs will include taxes.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	3,345 residents of low-mod income areas of the Kenilworth Neighborhood of which 2,040 are low-mod income persons
	Location Description	C.T. 80.03, B.G. 2, 3, 4 Kenilworth Neighborhood

	Planned Activities	The Town intends to pay tax bills on property that it is temporarily holding for future affordable housing development
9	Project Name	DISPOSITION - CONTRACTUAL SERVICES
	Target Area	Sheridan-Parkside Old Town Lincoln Park Kenilworth
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Revitalization
	Funding	CDBG: \$32,000
	Description	The town will enter into agreements with private contractors to pay for temporary holding costs associated with approximately 92 parcels being held for neighborhood redevelopment. Two separate contracts are anticipated that will cover snow removal services and lawn maintenance. The Town will contract for building enclosure services on a case by case basis, as needed.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	6,710 residents of which 4,925 are low-mod income persons
	Location Description	C.T. 83 B.G. 1,2,3 Sheridan-Parkside Neighborhood; C.T. 84, B.G. 3 Old Town Neighborhood; C.T. 80.01, B.G. 3, 5 Lincoln Park Neighborhood; C.T. 80.03, B.G. 2, 3, 4 Kenilworth Neighborhood
Planned Activities	The Town intends to contract for snow plowing, lawn maintenance, and building enclosures (as needed) for properties being temporarily held for future development.	
10	Project Name	RESIDENTIAL REHABILITATION - TOWN (Single-Unit)
	Target Area	n/a
	Goals Supported	Residential Rehabilitation - Owner Occupied
	Needs Addressed	Residential Rehabilitation - Owner Occupied

	Funding	CDBG: \$120,000 Entitlement; FY19 Estimated Program Income: \$50,000; FY20 Anticipated Program Income: \$277,000
	Description	The Town of Tonawanda will assist owner-occupied, low-moderate income homeowners, with 0% interest, deferred payment home repair loans secured with a mortgage. Repair work may include replacing leaking roofs, foundation walls, heating, plumbing, electrical, windows, doors, insulation, and lead-based paint remediation. Loans are paid back when the property title transfers or the home ceases to be the primary residence of the beneficiary.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	20 low-mod income households
	Location Description	Town-wide activity
	Planned Activities	The Town intends to assist at least 20 low-moderate income households.
11	Project Name	RESIDENTIAL REHABILITATION - TOWN (Multi-Unit)
	Target Area	n/a
	Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental
	Needs Addressed	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental
	Funding	CDBG: \$2,000 Entitlement; FY19 Estimated Program Income: \$25,000; FY20 Anticipated Program Income: \$73,000
	Description	The Town of Tonawanda will assist owner-occupied multi-family structures with rehabilitation assistance using 0% interest, deferred payment loans secured with a mortgage. Repairs may include fixing leaking roofs, foundation walls, heating, plumbing, electrical, windows, doors, insulation, and lead-based paint remediation. Loans are paid back when the property title transfers or the home ceases to be the primary residence of the beneficiary.

	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	4 low-mod income households
	Location Description	Town-wide activity
	Planned Activities	The town intends to assist 4 households with rental rehabilitation needs.
12	Project Name	HANDICAPPED ACCESSIBILITY - FREEDOM PROGRAM
	Target Area	n/a
	Goals Supported	Disabled Persons Assistance
	Needs Addressed	Disabled Persons Assistance
	Funding	CDBG: \$2,000
	Description	Low-moderate income homeowners are eligible for a 0% interest deferred payment loan program to make needed modifications to make their home more accessible. Eligible work items include entrance ramps, doorway modifications, bathroom, or kitchen modifications.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	The Town intends to assist 1 low-moderate income household
	Location Description	Town-wide activity
	Planned Activities	The Town intends to assist 1 low-moderate income household with accessibility modifications to their home.
13	Project Name	LEAD BASED PAINT IMPLEMENTATION
	Target Area	n/a

	Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Disabled Persons Assistance Code Enforcement
	Needs Addressed	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Disabled Persons Assistance Code Enforcement
	Funding	CDBG: \$10,000
	Description	The Town will contract with an environmental testing consultant who can perform lead based paint risk assessments and clearance reports for the clients of the Residential Rehabilitation Program. It is anticipated that 80% of the residences that participate in the Town's Residential Rehabilitation Program will have LBP issues identified and corrected.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	20 L/M households will receive LBP testing, risk assessment, and remediation.
	Location Description	Town-wide activity
	Planned Activities	The Town intends to contract with an environmental testing services company to provide LBP risk assessments and clearance reports for properties that apply to the Residential Rehabilitation Program.
14	Project Name	RESIDENTIAL REHABILITATION ADMINISTRATION
	Target Area	n/a
	Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Neighborhood Revitalization Disabled Persons Assistance Code Enforcement

	Needs Addressed	Residential Rehabilitation - Owner Occupied Neighborhood Revitalization Residential Rehabilitation - Rental Provide Assistance to Disabled Persons Code Enforcement
	Funding	CDBG: \$236,463
	Description	The Town employs 2 full-time and 1 part-time NYS certified Code Enforcement Officers as well as 1 full-time office clerk typist in the Planning and Development Office. This project covers the costs of salary, fringe benefits and training. The staff work full-time on the Residential Rehabilitation Program, Code Enforcement Program and the Freedom Program for Accessibility Modifications. They also perform structural assessments and provide oversight for the Acquisition and Demolition Program.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	24 low-moderate income households will benefit directly and approximately 3,000 low-moderate income neighbors will benefit indirectly
	Location Description	Town-wide activity
	Planned Activities	The Town intends to assign 2 full-time and 1 part-time NYS certified Code Enforcement Officers and 1 full-time office clerk typist to manage activities associated with the Residential Rehabilitation Program and Code Enforcement Program. They will also provide structural assessments for the Neighborhood Revitalization Program and assist disabled homeowners with accessibility modifications work specifications through the Freedom Program.
15	Project Name	HOME PROGRAM DELIVERY
	Target Area	n/a
	Goals Supported	Residential Rehabilitation - Owner Occupied Neighborhood Revitalization Code Enforcement

	Needs Addressed	Residential Rehabilitation - Owner Occupied Neighborhood Revitalization Code Enforcement
	Funding	CDBG: \$59,001
	Description	The town will assign code enforcement officers to oversee neighborhood revitalization plans including structural inspections for acquisitions, demolition oversight, and project oversight for the First-time Homebuyer Program. Also, office staff will be involved with income qualification of applicants in the Town's First-Time Homebuyer Program. Funds under this project cover staff salaries and fringe benefits associated with their time spent on HOME related activities.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,365 residents of Sheridan-Parkside of which 2,060 are low-mod income persons; 1,000 residents of Old Town of which 825 are low-mod income persons
	Location Description	Town-wide and some concentrated activity within Sheridan-Parkside and Old Town Neighborhoods.
	Planned Activities	The Town intends to assign 2 full-time and 1 part-time NYS certified Code Enforcement Officers and 1 full-time office clerk to manage certain activities associated with the Neighborhood Revitalization Program and the Town's First-Time Homebuyer Program.
16	Project Name	STREET RESURFACING - TOWN HIGHWAY
	Target Area	n/a
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$16,316

	Description	The Town's Highway Department laborers will be road milling existing street surfaces to reestablish curbing and reconstruct a 3" to 4" topcoat that will last at least another decade. All planned street resurfacing projects are located in low-moderate income neighborhoods and CDBG funding will be used for materials only. In rare instances, work may be contracted out. If so, all Federal regulations concerning procurement, labor, etc. will be adhered to. This project may have partial to full pre-award costs.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,500 low-mod income persons
	Location Description	As many sections as possible from the following priority needs list will be addressed at the discretion of the Highway Superintendent – Grandview Avenue, Lyndale Avenue, University Avenue, Eiseman Avenue, Kenview Avenue, Desmond Drive, Parkedge Avenue, Edgar Avenue, Irene Street, and Tillotson Place. Additional streets within low-mod income eligible neighborhoods may be added to the priority list at the discretion of the Highway Superintendent on an as needed basis.
	Planned Activities	The Town intends to purchase materials to resurface streets in low-moderate income neighborhoods. In rare instances, work may be contracted out. If so, all Federal regulations concerning procurement, labor, etc. will be adhered to. This project may have partial to full pre-award costs.
17	Project Name	PARKER BOULEVARD IMPROVEMENTS
	Target Area	Lincoln Park Kenilworth
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$252,500

	Description	Parker Boulevard in the Lincoln Park Neighborhood is being resurfaced and reprogrammed for improved bicycling and pedestrian infrastructure. Also, ADA compliant curb ramps will be installed along all intersections within the project boundaries. The project will also utilize \$924,000 in state CMAQ funds to replace a 1.3 mile stretch of roadway from Sheridan Drive south to Englewood Avenue and employ three mini-roundabouts in place of stop signs or traffic lights as cost effective intersection controls that increase public safety functioning. This project may have partial to full pre-award costs.
	Target Date	11/1/2023
	Estimate the number and type of families that will benefit from the proposed activities	5,000 persons in the Lincoln Park Neighborhood
	Location Description	C.T. 80.01, B.G. 5; C.T. 80.03, B.G. 4
	Planned Activities	ADA compliant curb ramps and sidewalks, bicyclist and pedestrian accommodations, narrowed vehicle lanes, and new intersection controls. This project may have partial to full pre-award costs.
18	Project Name	PEDESTRIAN SAFETY ACTION PLAN
	Target Area	n/a
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$160,000
	Description	The project will improve pedestrian safety and general accessibility at ten (potentially up to 12 if funds allow) intersections within the Town of Tonawanda. Improvements include re-striping crosswalks, adding pedestrian warning signs, replacing sidewalk ramps with ADA compliant ramps, and installing pedestrian signal equipment with accessible push buttons. CDBG funds will be used for the ADA compliant ramps and accessible push buttons. The additional improvements will be funded with \$315,140 of NYSDOT funds. This project may have partial to full pre-award costs.
	Target Date	11/1/2023

	Estimate the number and type of families that will benefit from the proposed activities	10,000 persons
	Location Description	The project will improve the following intersections: Ensminger Rd./Sheridan Parkside Dr.; Delaware Rd./Glencove Rd.; Delaware Rd./Highland Pkwy.; Delaware Rd./Kenton Rd.; Delaware Rd./Enola Ave.; Colvin Blvd./Deerhurst Park Blvd.; Colvin Blvd./Glencove Rd.; Colvin Blvd./Thornclyff Rd.; Colvin Blvd./Belmont Ave.; Brighton Rd./Parker Blvd. Two additional intersections may be improved if funding allows: Colvin Blvd./Highland Pkwy.; Elmwood Ave./Woodward Ave.
	Planned Activities	The project will improve pedestrian safety and general accessibility at ten (potentially up to 12 if funds allow) intersections within the Town of Tonawanda. This project may have partial to full pre-award costs.
19	Project Name	WATER/SEWER IMPROVEMENTS
	Target Area	n/a
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$10,000 Entitlement; FY19 Estimated Program Income: \$275,000
	Description	The Town Water Resources Department will hire a contractor or complete the work themselves (materials only), depending on scope of work, to line/repair/replace substandard water and/or sewer lines in low-moderate income neighborhoods. This project may have partial to full pre-award costs.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,000 persons
	Location Description	CDBG Income Eligible Neighborhoods

	Planned Activities	The Town Water Resources Department will hire a contractor or complete the work themselves (materials only), depending on scope of work, to line/repair/replace substandard water and/or sewer lines in low-moderate income neighborhoods. This project may have partial to full pre-award costs.
20	Project Name	SHERIDAN-PARKSIDE HEALTHY KITCHEN - LIFE CENTER
	Target Area	Sheridan-Parkside
	Goals Supported	Public Facilities Public Services
	Needs Addressed	Public Facilities Public Services
	Funding	CDBG: \$16,400
	Description	The Life Center located at 78 Pyle Court in the Sheridan Parkside Neighborhood will be a community center and church for area residents. Currently under construction, the Life Center has requested funding in order to create a community kitchen at the center. CDBG funds will be used to purchase and install kitchen equipment (refrigerator, freezer, microwave oven, 6 burner double oven, sink, fire retardant hood, and Kidde Fire Prevention system). Once the kitchen is complete, the Life Center will teach local residents (adults and children) how to shop for and cook economical meals (the service portion of this project will not be funded with CDBG money at this time). This project may have partial to full pre-award costs.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,365 residents of Sheridan-Parkside of which 2,060 are low-mod income persons. Within the first year, the Life Center has the goals of: 1. Reach 100 homes within Sheridan Parkside with one-time or on-going classes; 2. Partner with Holmes Elementary to hold parent/child classes to an additional 25 to 50 students; 3. Help supplement meals within the Sheridan Parkside Community for people with specific food health issues (i.e. diabetes, etc.)
	Location Description	C.T. 83, B.G. 1, 2, 3

	Planned Activities	Purchase and install kitchen equipment for the Life Center so they can provide adult and child education on how to shop for and cook economical meals. This project may have partial to full pre-award costs.
21	Project Name	MICROENTERPRISE LOAN PROGRAM
	Target Area	n/a
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$2,000
	Description	The Town will offer low-interest loans to micro-enterprises for business assistance to create or retain jobs within the Town of Tonawanda.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	The Town intends to assist at least one business (microenterprises) that qualifies as low-mod or that hires or retains low-moderate income workers within the Town.
	Location Description	Program is offered town-wide in eligible business areas.
	Planned Activities	Microenterprise and Small Business Assistance Programs
22	Project Name	CRIME RESISTANCE PROGRAM
	Target Area	Sheridan-Parkside Old Town Lincoln Park
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,000

	Description	The project pays for the salaries of police officers to conduct neighborhood walks in select income eligible neighborhoods. During these walks, police officers provide literature, information, and support to residents in need. This project also funds the Crime Resistance Executive Board's informational campaign in low-moderate income neighborhoods town-wide. The program pays for informational packets, mailings and material for the National Night Out special events as well as the neighborhood walks. A satellite police station in Lincoln Park is used to counsel troubled teens and their families. This project may have partial to full pre-award costs.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,500 Persons
	Location Description	C.T. 83 B.G. 1,2,3 Sheridan-Parkside Neighborhood; C.T. 84, B.G. 3 Old Town Neighborhood; C.T. 80.01, B.G. 3, 5 Lincoln Park Neighborhood
	Planned Activities	The Town intends to fund community policing activities and informational campaigns that assist the Town's Police Department with crime awareness amongst the low-moderate income neighborhoods. This project may have partial to full pre-award costs.
23	Project Name	SENIOR TRANSPORTATION SERVICE
	Target Area	n/a
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$45,480
	Description	The Town's Senior Citizen Center operates a van transportation program for low-moderate income seniors to access their daily needs. The CDBG funding helps with the cost of staff drivers, fuel, maintenance and repairs to assist with providing this service, and subsidizes the cost to clients.
	Target Date	3/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	3,000 riders
	Location Description	Town-wide service area
	Planned Activities	Operate a van transportation program for low-moderate income seniors to access their daily needs.
24	Project Name	YOUTH SERVICES - PRIME TIME PROGRAM
	Target Area	Sheridan-Parkside
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$27,955
	Description	The Town will fund an after-school and summer time youth services program in the Sheridan-Parkside Community Center. This program provides structured recreational and educational programming to neighborhood youth during off school time. The program is staffed by personnel from the Town's Youth, Parks, and Recreation Department.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2,500 persons
	Location Description	C.T. 83, B.G. 1,2,3
	Planned Activities	Operate an after-school and summer time youth services program in the Sheridan-Parkside Community Center.
25	Project Name	GENERAL ADMINISTRATION
	Target Area	n/a

Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Public Infrastructure Public Facilities Neighborhood Revitalization Public Services Housing Counseling Disabled Persons Assistance Weatherization Assistance Code Enforcement Homeless Assistance Economic Development
Needs Addressed	Residential Rehabilitation - Owner Occupied Public Infrastructure Neighborhood Revitalization Economic Development Housing Counseling Residential Rehabilitation - Rental Provide Assistance to Disabled Persons Public Facilities Provide Weatherization Assistance Code Enforcement Provide Assistance to the Homeless Public Services
Funding	CDBG: \$300,000
Description	General management, oversight and coordination of the Community Development Block Grant Program. Administrative expenses include salaries for staff that oversee the efficient use of federal funds in accordance with HUD regulations. Administration covers salaries, fringe benefits, mileage, rent, postage, printing brochures, public notices, printing newsletters, fair housing activities, drug-free workplace, seminars, office supplies, equipment, planning amendments, environmental reviews, etc.

	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approx. all 72,600 Town and Village residents
	Location Description	n/a
	Planned Activities	General management, oversight and coordination of the Community Development Block Grant Program.
26	Project Name	HOUSING COUNSELING
	Target Area	n/a
	Goals Supported	Housing Counseling
	Needs Addressed	Housing Counseling
	Funding	CDBG: \$8,000
	Description	The Town will contract with a HUD-certified housing counseling agency to assist low-moderate income persons who are experiencing housing issues. They will also conduct homeownership classes to prospective homebuyers looking to qualify for government assistance to purchase their first home.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 80 low-moderate income households
	Location Description	Town-wide activity
	Planned Activities	The Town intends to enter into a contract with Belmont Resources for WNY to provide housing counseling services to residents on an as-needed basis.
27	Project Name	WEATHERIZATION PROGRAM
	Target Area	n/a
	Goals Supported	Weatherization Assistance

	Needs Addressed	Provide Weatherization Assistance
	Funding	CDBG: \$8,200
	Description	The Town will contract with Supportive Services Corporation to conduct free energy assessments on low-moderate income homeowner structures to see if they would qualify for weatherization services. Qualified homeowners would be eligible for funds for energy efficiency work including insulation, free energy-efficient appliances, or sealing around windows and doors.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 low-moderate income households.
	Location Description	Town-wide activity
	Planned Activities	The Town intends to enter into a subrecipient agreement with Supportive Services Corporation to provide weatherization energy audits for low-moderate income residents.
28	Project Name	VILLAGE - RESIDENTIAL REHABILITATION (SINGLE-UNIT)
	Target Area	Village of Kenmore
	Goals Supported	Residential Rehabilitation - Owner Occupied
	Needs Addressed	Residential Rehabilitation - Owner Occupied
	Funding	CDBG: \$30,000 Entitlement; FY19 Estimated Program Income: \$50,000; FY20 Anticipated Program Income: \$50,000
	Description	The Village of Kenmore will provide 0% interest, deferred payment loans to low-moderate income homeowners to repair their home. Eligible work items include roof replacement, foundation wall work, windows, doors, electrical, plumbing, heating, and lead-based paint remediation.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	5 low-mod income households

	Location Description	Village of Kenmore, NY - C.T. 85, 86, 87, 88
	Planned Activities	The Village intends to complete 5 rehabilitation jobs for low-moderate income homeowners.
29	Project Name	VILLAGE - RESIDENTIAL REHAB ADMINISTRATION
	Target Area	Village of Kenmore
	Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Code Enforcement
	Needs Addressed	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Code Enforcement
	Funding	CDBG: \$4,974
	Description	The Village of Kenmore will employ a part-time NYS certified Code Enforcement Officer to work on the Residential Rehabilitation Program including conducting initial inspections, write-up work specifications, interim inspection reports, and process final inspections and request for payments to contractors performing work under the program. One part-time office staff will assist with client income verification and eligibility processing, loan processing, and ensuring compliance with federal regulations regarding the use of CDBG funds in a rehabilitation case.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	5 low-mod income households
	Location Description	Village of Kenmore, NY - C.T. 85, 86, 87, 88
	Planned Activities	The Village intends to provide the necessary administration in order to complete 5 rehabilitation jobs for low-moderate income homeowners.
30	Project Name	VILLAGE - CODE ENFORCEMENT
	Target Area	Village of Kenmore

	Goals Supported	Code Enforcement
	Needs Addressed	Code Enforcement
	Funding	CDBG: \$6,000
	Description	The Village of Kenmore will employ 1 part-time NYS certified code enforcement officer to conduct code inspections of residential properties within the low-moderate income census tract block groups of the Village of Kenmore. Property owners who have outstanding code violations will be issued a citation and corrective action will be ensured through the appropriate judicial process.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,130 low-mod income persons within low-mod income eligible neighborhoods
	Location Description	Village of Kenmore eligible neighborhoods - CT 86, BG 5; CT 87, BG 1; CT 87, BG 4
	Planned Activities	Employ 1 part-time NYS certified code enforcement officer to conduct code inspections of residential properties within the low-moderate income census tract block groups of the Village of Kenmore.
31	Project Name	VILLAGE - LBP IMPLEMENTATION
	Target Area	Village of Kenmore
	Goals Supported	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Code Enforcement
	Needs Addressed	Residential Rehabilitation - Owner Occupied Residential Rehabilitation - Rental Code Enforcement
	Funding	CDBG: \$2,000
	Description	The Village will contract with an environmental services company for lead-based paint testing services. The company will perform risk assessments and clearance reports in accordance with Part 35 implementation requirements for all households in the Residential Rehabilitation Program.

	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	5 low-mod income households
	Location Description	Village of Kenmore, NY - C.T. 85, 86, 87, 88
	Planned Activities	Perform risk assessments and clearance reports in accordance with Part 35 implementation requirements for all households in the Residential Rehabilitation Program.
32	Project Name	VILLAGE - STREET RESURFACING
	Target Area	Village of Kenmore
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$2,000
	Description	The Village of Kenmore Department of Public Works will hire a contractor or complete the work themselves (materials only), depending on scope of work, to replace deteriorated road surfaces in LMI neighborhoods.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,130 low-mod income persons within low-mod income eligible neighborhoods
	Location Description	Village of Kenmore eligible neighborhoods - CT 86, BG 5; CT 87, BG 1; CT 87, BG 4
	Planned Activities	The Village of Kenmore Department of Public Works will hire a contractor or complete the work themselves (materials only), depending on scope of work, to replace deteriorated road surfaces in LMI neighborhoods.
33	Project Name	VILLAGE - SIDEWALK REPLACEMENT
	Target Area	Village of Kenmore

	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$200,000
	Description	The Village Department of Public Works will hire a contractor or complete the work themselves (materials only), depending on scope of work, to replace deteriorated sidewalks in low-moderate income neighborhoods throughout the Village. Replacement sidewalks and ramps will be constructed to meet new ADA compatibility requirements.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,130 LMI persons; 1,985 persons total; 57% LMI
	Location Description	Village of Kenmore - CT 86, BG 5; CT 87, BG 1; CT 87, BG 4
	Planned Activities	The Village Department of Public Works will hire a contractor or complete the work themselves (materials only), depending on scope of work, to replace deteriorated sidewalks in low-moderate income neighborhoods throughout the Village. Replacement sidewalks and ramps will be constructed to meet new ADA compatibility requirements.
34	Project Name	VILLAGE - SANITARY SEWER REPLACEMENT
	Target Area	Village of Kenmore
	Goals Supported	Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$2,000
	Description	The Village of Kenmore will hire a contractor or complete the work themselves (materials only), depending on scope of work, to line/repair substandard sanitary sewer lines in low-moderate income neighborhoods.
	Target Date	3/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	1,130 LMI persons; 1,985 persons total; 57% LMI
	Location Description	Village of Kenmore eligible neighborhoods - CT 86, BG 5; CT 87, BG 1; CT 87, BG 4
	Planned Activities	The Village of Kenmore will hire a contractor or complete the work themselves (materials only), depending on scope of work, to line/repair substandard sanitary sewer lines in low-moderate income neighborhoods.
35	Project Name	VILLAGE - COMMUNITY POLICING
	Target Area	Village of Kenmore
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$20,000
	Description	The Village of Kenmore will operate a citizen's police academy, will attend various community events, and will use extra patrols in the low-mod income block groups. They also have an active neighborhood watch program that meets regularly to share information on criminal activity.
	Target Date	3/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1,130 LMI persons; 1,985 persons total; 57% LMI
	Location Description	Village of Kenmore eligible neighborhoods - CT 86, BG 5; CT 87, BG 1; CT 87, BG 4
	Planned Activities	Citizen's police academy, neighborhood watch group meetings, farmer's market presence
36	Project Name	ESG - SHELTER
	Target Area	n/a
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Assistance

	Funding	ESG: \$50,800
	Description	The Town will enter into a subrecipient agreement with Compass House to provide shelter services to unaccompanied youth ages 12 to 17.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Compass House is located in the City of Buffalo and serves the regional youth homeless population
	Planned Activities	Provide shelter services to unaccompanied youth ages 12 to 17
37	Project Name	ESG – HOMELESS PREVENTION
	Target Area	n/a
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$34,286
	Description	The Town will enter into subrecipient agreements with Compass House (for \$4,200) and Restoration Society (for \$30,086) to provide homeless prevention services to those at risk of becoming homeless.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Compass House and Restoration Society are located in the City of Buffalo and serve the regional homeless / at risk of being homeless population
	Planned Activities	Provide homeless prevention services to those at risk of becoming homeless
	Project Name	ESG – RAPID RE-HOUSING

38	Target Area	n/a
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$45,200
	Description	The Town will enter into a subrecipient agreement with Restoration Society to provide rapid re-housing services to the homeless.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Restoration Society is located in the City of Buffalo and serves the regional homeless population
	Planned Activities	Provide rapid re-housing services to the homeless
39	Project Name	ESG – DATA COLLECTION
	Target Area	n/a
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$6,000
	Description	The Town will enter into a subrecipient agreement with the Homeless Alliance of Western New York (HAWNY) to provide data collection and training services for Compass House, Restoration Society, and the Town of Tonawanda.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	HAWNY is located in the City of Buffalo and serves the regional homeless population
	Planned Activities	Provide data collection and training services for Compass House, Restoration Society, and the Town of Tonawanda
40	Project Name	ESG – ADMINISTRATION
	Target Area	n/a
	Goals Supported	Homeless Assistance
	Needs Addressed	Homeless Assistance
	Funding	ESG: \$5,000
	Description	The Town’s Office of Planning and Community Development will provide general grant administrative services.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	n/a
	Planned Activities	Provide general grant administrative services

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

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

The Town of Tonawanda has historically concentrated its CDBG & HOME funding into three Town neighborhood preservation districts and the Village of Kenmore. The neighborhoods of Sheridan-Parkside, Old Town, Lincoln Park, and the Village of Kenmore all have higher concentrations of low-moderate income households and higher concentrations of minorities.

Sheridan-Parkside is a 160-acre WWII-era 1,200-unit development just West of Military Road and north of Sheridan Drive. The vacancy rate in this neighborhood (~12%) trends higher than the Town overall (~6%). The ACS data shows a low-mod percentage of approximately 87%. Since the early 1990's, the Town has demolished approximately 240 vacant substandard housing units and built 37 new affordable single-family homes in Sheridan-Parkside.

The Old Town Neighborhood contains 9 street blocks, has about 65 acres, and 419 living units, of which numerous are not suitable for rehabilitation and can be considered uninhabitable. There are approximately 168 rental units and 251 owner-occupied units. The ACS data shows a low-mod rate of approximately 82.5%. The Town will continue to address any structures that become neglected through deferred maintenance.

Lincoln Park Neighborhood is the largest and most populous of the low-moderate income neighborhoods in Tonawanda. It is located about 0.25 mile north of the Main Street Campus of the University at Buffalo. Some of the main streets in the neighborhood are Parker Boulevard, Highland Avenue, Decatur Avenue, and Kenilworth Avenue. The ACS data shows a low/mod income rate of approximately 48%.

The Village of Kenmore is the 1.5 square mile incorporated limits immediately North of the City of Buffalo following Delaware Avenue, Elmwood Avenue, and Military Road. Low-mod rates vary in the eligible block groups from 53% to 65%.

Geographic Distribution

Target Area	Percentage of Funds
Sheridan-Parkside	24
Old Town	1
Lincoln Park	18
Village of Kenmore	20

Table 35 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Town has recognized the needs of the people in these neighborhoods because the 2015-2019 ACS data shows that in Sheridan-Parkside 87% of its residents have a low to moderate-income. There are

1,058 minorities, the highest concentration in any town neighborhood outside of the Village of Kenmore. There are 525 female head of households with own children under 18 years of age, which represents the highest concentration in the town. Out of the 1,205 housing units remaining, numerous units are substandard, not suitable for rehabilitation and cannot be occupied. Of the remaining suitable units, if maintenance continues to be neglected, a substantial number of those units will also become substandard, not suitable for rehabilitation and uninhabitable. According to the September 2015 quarterly data from the USPS and HUD, the vacancy rate was approximately 7%. The vacancy rate has decreased about 5% since September 2010 but is still too high to be considered a stable neighborhood. According to the 2013-2017 ACS data, the vacancy rate was as high as 12%.

In Old Town, the 2015-2019 ACS data shows that this Neighborhood Revitalization District has 82.5% of its households at the low to moderate-income level. There are also 519 minorities, a high concentration when compared to other town neighborhoods. There are also 32 female head of households with own children under 18 years of age. According to the September 2015 Quarterly Vacancy Data provided by the USPS, the vacancy rate has been steady over the last several years at approximately 8%.

In Lincoln Park, the ACS data shows that the population's low-moderate income rate is approximately 48%. 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.

Within the Village of Kenmore, the 2015-2019 ACS data shows that the HUD eligible block groups have between 53% - 65% of its households at the low to moderate-income level. Also, the population data shows a composition of 297 minorities and 42 female head of households with own children under 18 years of age in the eligible low-moderate income block groups.

Discussion

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

The Town of Tonawanda received an ESG allocation from 1987-1998, from 2003-2012, and from 2015 - 2016. The Town did not receive any ESG funding for FY 2017, but resumed the program funding in FY 2018-2019. The Town has been following its revised ESG policies and procedures for its coordinated planning process with the Homeless Alliance of WNY.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

The Town of Tonawanda reaches homeless persons through Police Department interaction, through the personnel at Kenmore Mercy Hospital, and through the Ken-Ton School District. Information is provided to those agencies that provide contact information for homeless services agencies in WNY including the Town's ESG subrecipient agencies.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Town coordinates ESG program funding every year through a Request for Proposals (RFP) process with area homeless service providers who request ESG funding for a variety of needs. The Town also involves the Homeless Alliance of WNY on the distribution of the ESG awards to make sure that the funds are being used to further the goals of the Region's Plan to End Homelessness.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Town has placed an emphasis on awarding funds to rapid re-housing programs and homelessness prevention programs that focus on keeping homeless persons out of shelters for extended periods of time. It is important to safely house the homeless quickly and be able to follow up with needed stabilization and support services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions) or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Town has placed an emphasis on awarding funds to rapid re-housing programs and homelessness

prevention programs that focus on keeping homeless persons out of shelters for extended periods of time. The Town provides contact information of area homeless services agencies to public and private systems of care agencies that may be discharging low-income individuals and families.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

The Tonawanda Senior Center has been in operation for approximately 50 years. For the past quarter century, the main center, open five days a week, has been housed in a former school building on Ensminger Road; in addition, there are two branches. The Kenmore-Mang branch is open on Mondays and Thursdays and the Ellwood branch is open one day per week on Tuesdays.

Approximately 3,000 senior citizens age 60 or over pay the nominal charge for annual membership. Daily use of the main center averages about 100 persons per day. The Center offers some 75 recreation programs. Some activities are free and structured classes such as ceramics, paintings, dance lessons, and wood shop charge a fee. Seniors may also sign up for trips that may be both day trips as well as extended trips for one night or more.

Through the County nutrition program and local kitchen staffing, the Ensminger Road site offer daily lunches for a modest fee. Average participation is 40-45 persons per day. In addition, the County in cooperation with the Village of Kenmore offers a daily lunch program at the Kenmore-Mang branch. Lunch participation at this location averages about 15 persons per day.

Seniors can also take advantage of the Town's van service which is operated by the Town's Recreation Department with some subsidies by the County. Three vans with a capacity of 8 persons in each van operate five days per week. Van services are provided at a fee with the majority of persons using the van service for medical appointments. The vans usually operate at or near capacity each day. One does not have to be a registered member of the Senior Center to utilize the van service.

The Senior Center does not provide an outreach service to seniors. Most seniors in the Town are aware of the scope of services offered by the Senior Center and if they have need for services beyond those offered by the Senior Center, they normally call the County Senior Services Department to meet those needs. In addition, the Senior Center may receive several calls per month from seniors with various service needs. These are usually referred to County Senior Services.

In conjunction with the County, Meals on Wheels in the Town of Tonawanda are provided through the Sheridan-Parkside Community Center. An average of 230 hot meals and 140 cold meals per day are provided through the program.

The Town also operates a Freedom Program that provides loans to income eligible residents to modify their homes for creating more accessible living arrangements. Funds are provided to those with a physical handicap or those which have family members who are physically disabled for bathroom modifications, or entryway modifications to ease daily living issues.

Actions planned to foster and maintain affordable housing

The Town of Tonawanda has an affordable housing stock when compared both nationally and regionally.

The median sale price for a home is around \$149,400. The monthly rent for a 1 or 2-bedroom apartment is in the range of \$700-\$800. The Town uses its Residential Rehabilitation Program to keep low-moderate income families in their existing homes. The Town is also in the process of updating its zoning code to remove barriers for more accessible housing units. Several multi-family housing projects that target the senior citizen population are currently being planned and will most likely qualify for the LIHTC program.

Actions planned to reduce lead-based paint hazards

All prospective homeowners applying for rehabilitation funding that will involve disturbance of painted surfaces are advised in an application cover letter of the new LBP regulations and the possibility of being relocated (as well as tenants if it is a multi-unit) during the removal of any lead hazard found during the process. During initial inspection of a property, a Code Enforcement Officer will explain how the LBP regulations apply to the Town of Tonawanda Residential Rehabilitation Program.

When determined necessary, the occupants may be temporarily relocated. For example, if it would take more than one day to rehabilitate the bathroom, then the family may rent a hotel room at the Town's expense.

The Town retains the services of a LBP testing contractor annually to perform testing services for the residential rehabilitation program. If the rehab client's home was built before 1978, and if the project will involve disturbance of painted surfaces, then the Code Enforcement Officer will require that a Risk Assessment be performed by the LBP Testing Contractor. The firm will provide the necessary lead hazard testing for the Town of Tonawanda. All costs associated with the LBP risk assessment will be paid by the Town of Tonawanda.

Risk Assessment test results are evaluated by the CD Code Enforcement Officer. If he concurs with the report, Work Write-Ups/Specifications are prepared by the Officer for items identified in the Risk Assessment as being in need of hazard control. A copy of the Lead Risk Assessment (which includes the "Reducing Lead Hazards When Remodeling Your Home" and "Protect Your Family from Lead in Your Home" pamphlets) is provided to the homeowner (and to the tenant if it is a multi-unit) when the specifications are delivered to the homeowner.

After the completion of the lead based paint work items by the building trades contractor, the LBP contractor performs a clearance test, the cost of which is paid by the Town. If the work items pass the clearance test, a voucher for payment for those work items is prepared. If the work items do not pass the clearance test, the building trades contractor is notified by the Building Inspector. The contractor, in turn, re-cleans the work items and notifies the Building Inspector that he is ready for a second clearance test to be ordered. The building trades contractor is responsible for payment of further clearance tests required for the work items to pass.

Once the work items pass the clearance test and the building contractor submits payment for the additional clearance test(s) to the LBP contractor, the Town prepares a voucher for payment of the work

item.

Actions planned to reduce the number of poverty-level families

The Town of Tonawanda recognizes that housing programs by themselves will not eliminate or reduce poverty. Subsidized programs such as those targeted in the Consolidated Plan can free up cash resources for living necessities, but these programs alone cannot raise a household above the poverty level. Where appropriate and feasible, the town will coordinate their housing programs with services designed to assist low income households to break the cycle of poverty.

The Erie County Public Housing Authority has established an Action Plan for the Family Self-Sufficiency Program. This program provides rent subsidies to eligible households in concert with other social services and programs on terms that encourage personal responsibility leading to financial independence.

Fundamentally, a sound and growing economy is one of the most critical factors in helping to reduce poverty. The town has engaged in various initiatives and programs to promote business, jobs, and training. The Town of Tonawanda Business Incentive Fund Loan Program offers loans to companies which will create jobs, a majority of which will be offered to low-moderate income persons.

The Town of Tonawanda Empire Zone made the creation of jobs more attractive; no property tax, payroll tax, or sales tax on the purchase of equipment is required to be paid. The Empire Zone rules require that residents of Sheridan Parkside Village Courts receive special consideration when a company in the Empire Zone is hiring. The companies that have located in the zone will continue to receive benefits for 1-10 years depending on their initial start date in the zone.

The Town is also proactively planning and investing in infrastructure in two new business parks at the North Youngmann Commerce Center and the Riverview Solar Technology Park that contain a total of 150 acres of “shovel-ready” land for redevelopment. Both projects benefited from the Empire Zone designation and will hopefully remain part of any successor program that New York State develops.

Training and employment opportunities that are available to low and moderate-income persons through the NYS Labor Department and the local Workforce Development Board include:

- economically disadvantaged adults who need training and job skills to secure employment;
- dislocated workers who are also economically disadvantaged and have been laid off and are waiting to be recalled to the same or similar occupation (e.g., a steel worker); and
- summer jobs for youth who are from low- and moderate-income families along with on-the-job education classes for the duration of their job.

Employment opportunities may be available for Community Development projects under the Section 3 requirement. Section 3 provides for preference to be given to a contractor who meets requirements for

Section 3 certification by agreeing to hire low-income town residents for that project.

The Town will continue to advise residents of employment opportunities and economic development in the Town of Tonawanda through the official newspaper, the Ken-Ton Bee, and through their official website at <http://www.tonawanda.ny.us>.

Actions planned to develop institutional structure

No actions are planned at this time.

Actions planned to enhance coordination between public and private housing and social service agencies

The Town of Tonawanda has partnered with the Mobile Safety Net Team and area social service agencies to open a “Community Hub” in the Kenmore Public Library. The Hub brings service providers to those persons needing assistance for a variety of items including accessing health care, affordable housing, free legal assistance, public assistance, and counseling services. The Hub is open to all every third Thursday of the month.

Discussion

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

Introduction

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	0
---	---

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

See attached document prepared by the Homeless Alliance of WNY.
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

See the attached description of the coordinated assessment system.
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Town conducts a Request for Proposal process for soliciting interest in the use of ESG funding. Proposals are graded by staff in the Planning and Development Department and discussed with the staff at the Homeless Alliance of WNY. A recommendation is put forth in the Annual Action Plan and

a final decision on selected agencies is made by the Town Board.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Town requires each contracted homeless service agency to involve homeless participants as required in 24 CFR 576.405(a).

5. Describe performance standards for evaluating ESG.

The performance standards are identified in the HAWNY written standards documentation (attached).

Discussion