



ANNUAL ACTION PLAN FY 2020

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

April 1, 2020 - March 31, 2021

Town of Amherst Community Development



Expected Resources

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

Introduction

The Town of Amherst will receive \$623,151 in Community Development Block Grant funding for 2020, with roughly \$170,000 in program income received during the program year. The Amherst, Cheektowaga, Tonawanda (A-C-T) HOME Consortium will receive \$938,950 in 2020 HOME Investment Partnerships Grant funding, with an anticipated \$800,000 in program income from HOME housing rehabilitation and homebuyer and acquisition-rehabilitation-resale activities. The Town of Amherst also has another \$300,000 in the New York State Affordable Housing Grant to match and supplement the CDBG and HOME funding allocated to its housing rehabilitation program. Any increases in CDBG funds for Amherst will be allocated to the Homeowner Rehab Program and Amherst Youth and Recreation Center, while decreases will be absorbed in the Homeowner Rehab Program. Any increases or decreases in the HOME funding in the allocations from HUD will be applied to the Homeowner Rehabilitation Programs for the Consortium.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	623,151	170,000	0	793,151	0	

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	938,950	800,000	0	1,738,950	0	

Table 1 - Expected Resources – Priority Table

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

The Town of Amherst has received a \$300,000 New York State Affordable Housing Corporation Grant in 2018 that offers eligible single family homeowners a forgivable grant amount toward the rehabilitation of their home. The grant matches the Town's CDBG or HOME rehabilitation funds 60/40. The CDBG or HOME portion of the assistance is offered as a 0% deferred loan, to be repaid at sale or transfer of the property, or if the homeowner no longer permanently resides in the home. It typically takes three years for Amherst to utilize all of the NYS grant funds.

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

N/A

Discussion

N/A

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Housing Stock	2020	2021	Affordable Housing	Town Wide Eggertsville	Acquisition Rehabilitation Resale Handicapped Accessibility Residential Rehab- Owner occupied Rental Residential Rehab- Owner-Occupied Military Grant Residential Rehabilitation-Owner- Occupied HOME Construction Rental Subsidy - Special Populations	CDBG: \$266,831 HOME: \$465,055	Homeowner Housing Rehabilitated: 25 Household Housing Units Rental units rehabilitated: 1 Household Housing Units Special Population Housing constructed: 1 Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Promote Affordable Homeownership	2020	2021	Affordable Housing	Eggertsville Town Wide	Homebuyer Assistance for Affordable Hsg Acquisition-Rehabilitation/New Construction- Resale	CDBG: \$30,000 HOME: \$380,000	Direct Financial Assistance to Homebuyers: 4 Households Assisted Homeowner Housing Added: 1 Household Housing Unit
3	Provide Assistance to At-Risk Population	2020	2021	Affordable Housing Homeless Non-Homeless	Town Wide Eggertsville	Assist Victims of Domestic Violence Hsg Counseling & Foreclosure Prevention Assist	CDBG: \$52,500	Homelessness Prevention: 150 Persons Assisted
4	Weatherization Assistance	2020	2021	Affordable Housing	Town Wide	Weatherization Assistance	CDBG: \$14,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
5	Affirmatively Further Fair Housing	2020	2021	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG: \$10,000	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
6	Historic Preservation/Elimination of Slum & Blight	2020	2021	Preservation	Town Wide	Historic Preservation	CDBG: \$33,620	Facade treatment/business building rehabilitation: 1 Business

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Community Services	2020	2021	Non-Housing Community Development	Eggertsville Town Wide	Community Policing Public Services - Youth Services Senior Services	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
8	Public Facilities and Infrastructure	2020	2021	Non-Housing Community Development	Town Wide, Eggertsville, Opportunity Zone	Neighborhood Beautification/Public Infrastructure	CDBG: \$60,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,500 Persons Assisted

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Improve Housing Stock
	Goal Description	<p>Amherst will utilize CDBG resources to improve and maintain quality affordable housing stock through funding for maintenance and rehabilitation of (i) existing owner-occupied low-income rental housing, (ii) existing renter-occupied low-income housing, (iii) Military Veteran household units, (iv) and households in need of improvements for handicapped accessibility.</p> <p>Conduct homeowner rehabilitation for ten extremely low-income, fifteen low-income, nine moderate-income, and three Military Veteran households through the Towns' Housing Rehabilitation Program. The programs improve and maintain quality affordable housing stock within the Towns of Amherst, Cheektowaga and Tonawanda.</p> <p>CDBG: Amherst \$405,056 (includes \$146,225 Program Income)</p> <p>HOME: Amherst \$171,685 (\$30,000 in Program Income); Tonawanda \$251,685(\$90,000 in Program Income); Cheektowaga \$161,685 (EN Only)</p> <p>Previous years funding will supplement the HOME EN funding for the Residential Rehab Programs. Improvements for handicapped accessibility are offered through the Towns' Homeowner Rehab Programs. Approximately five units will be assisted for senior's aging-in-place or homeowners with physical challenges.</p> <p>Both Amherst and Cheektowaga will also provide a HOME Rental Subsidy Program to provide a long-term deferred 0% loan towards the construction of new affordable rental housing developments serving LMI seniors, disabled, special populations. The program will generate approximately 5 HOME subsidized units, assisting 5 households.</p> <p>HOME: Amherst \$90,000 in PI HOME funds are allocated.</p> <p>HOME: Cheektowaga \$400,000 in PI HOME funds are allocated.</p>

2	Goal Name	Promote Affordable Homeownership
	Goal Description	<p>Promote Home Ownership for Low-/Moderate Income Households by providing the following: purchase assistance through the Towns' First-time Home Buyer Programs; and creation of new affordable housing through the Consortium's Acquisition/Rehab or New Construction/Resale Program.</p> <p>Through the HOME Investment Partnership Program affordable homeownership opportunities will be made available to persons with incomes below 80% median income in the Towns of Cheektowaga, Amherst and Tonawanda. The First-time Homebuyer Program will provides closing cost assistance (0% loans) to approximately six income qualifying individuals. The First-Time Homebuyer Program goals and HOME funding is indicated below:</p> <p>HOME: Cheektowaga – Assist 4 homebuyers; \$0 allocated, as \$47,592 remains in prior years allocations.</p> <p>HOME: Amherst - Assist 4 homebuyers; \$0 allocated, as \$35,840 remains in prior years allocations.</p> <p>HOME: Tonawanda – Assist 3 homebuyers; \$20,000 allocated, with \$24,374 remaining in prior years allocations.</p> <p>The Acquisition-Rehabilitation/New Construction-Resale program will help to expand the supply of decent, safe and affordable housing to low and moderate income households and will promote economic self-sufficiency for lower income families and individuals who are first-time homebuyers. The Consortium will assist three households with this opportunity in 2020. The HOME funding for the Acquisition-Rehab/New Construction/Resale Program is allocated accordingly:</p> <p>CDBG: Amherst - \$30,000 for acquisition only</p> <p>HOME: Amherst - \$200,000 (includes \$60,000 in Program Income), prior years program income will also be applied.</p> <p>HOME: Cheektowaga - \$210,000 (includes \$90,000 in Program Income), prior years program income will also be applied.</p> <p>HOME: Tonawanda - \$100,000</p>

3	Goal Name	Provide Assistance to At-Risk Population
	Goal Description	<p>Provide assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless. Amherst’s CDBG funding will be utilized to provide public services through the YWCA of WNY, Belmont Housing Resources for WNY, and Buffalo Urban League to prevent homelessness of certain at-risk populations. Also, Amherst will assist the Family Justice Center with facility improvements and Outreach to Teens regarding intimate partner violence. The Family Justice Center serves victims of domestic violence and has a satellite office in Amherst.</p> <p>The YWCA works with victims of domestic violence in Amherst and provides temporary housing and supportive service programming to help the women and their families to escape violence and become self-sufficient. The YWCA provides case management services for homeless domestic violence victims, with four housing units in the Town of Amherst.</p> <p>Buffalo Urban League provides housing counseling services to ensure families find and maintain affordable housing options that work for them. Counseling includes foreclosure prevention; first-time homebuyer education; financial management counseling; rental-assistance counseling; and fair housing counseling.</p> <p>Belmont Housing Resources for WNY provides a variety of counseling services to assist first-time homebuyers; help persons with credit problems to qualify for FHA insured mortgages; help persons save their homes from foreclosure with financial counseling and intervention with mortgagors; assist renters in resolving disputes with landlords; all of which assist in preventing homelessness.</p> <p>Amherst will utilize CDBG funding to provide this assistance and aims to assist 200 households.</p> <p>CDBG: Amherst - \$8,000 Buffalo Urban League</p> <p>CDBG: Amherst - \$25,000 YWCA</p> <p>CDBG: Amherst - \$16,500 Belmont Housing Resources for WNY</p> <p>CDBG: Amherst - \$3,000 Family Justice Center</p>

4	Goal Name	Weatherization Assistance
	Goal Description	<p>Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable housing.</p> <p>This program will create more energy efficient housing units for low-moderate income homeowners by providing energy audits resulting in as-needed energy efficient furnaces, insulation, windows and, in some cases, energy efficient refrigerators. The energy savings will assist in creating a more affordable housing environment throughout the Consortium. Through CDBG funding, the Town covers an administration fee (\$200) per unit assisted.</p> <p>CDBG: Amherst – 50 units assisted, \$14,000 allocated</p>
5	Goal Name	Affirmatively Further Fair Housing
	Goal Description	<p>Ensure access to fair, safe and affordable housing for all residents and strive to prevent discrimination in housing and the workplace.</p> <p>Amherst, through CDBG funding, provides fair housing counseling services via Housing Opportunities Made Equal. Housing Opportunities Made Equal provides education and enforcement action for fair housing and landlord tenant disputes and reports perceived discrimination in housing and employment.</p> <p>CDBG: Amherst - \$10,000 Allocated</p>
6	Goal Name	Historic Preservation/Elimination of Slum & Blight
	Goal Description	<p>Address buildings and public facilities in need of repair in order to eliminate neighborhood slum and blight.</p> <p>Currently the Village of Williamsville has identified the Williamsville Section House on the former Rail Yard south of Main Street in the Village as in need of stabilization and preservation services. They will allocate a portion of their 2020 share (7%) of CDBG funding to stabilize this Historic Landmark structure. .</p> <p>CDBG: Williamsville - \$33,620 allocated.</p>

7	Goal Name	Community Services
	Goal Description	<p>Improve the quality of life for families and youths and seniors in the community by providing afterschool programming, and community policing events.</p> <p>The Town of Amherst will provide after-school programming with the Boys and Girls Club of Buffalo in the Eggertsville Community Center to serve youths from low-and-moderate income families in the neighborhood. The after-school programs are expected to benefit over 50 children in 2020.</p> <p>CDBG: Amherst - \$37,000 allocated</p> <p>In addition, Amherst Recreation Department and Police Department will hold community policing/public safety events in the Eggertsville neighborhood and at the Senior Center to build better community relationships to the local police force. The Police Department will also provide utilize these events to provide public safety information to area families and seniors. The Community Policing events will be provided by CDBG funding and serve approximately 200 people in our target neighborhoods.</p> <p>CDBG: Amherst - \$8,000 allocated</p> <p>Amherst Senior Transportation Services will be provided with \$5,775 from program income to roll into the purchase of new vehicles that provide transportation services to Amherst’s seniors. This amount was received from them in 2019 from the sale of vehicles that were previously purchased with CDBG funds.</p> <p>CDBG: Amherst - \$5,775 from Program Income</p>
	Goal Name	Public Facilities and Infrastructure

8	Goal Description	<p>CDBG Public Infrastructure for PY 2020 will focus on the Village of Williamsville’s conversion of the Glen Park Nature Center into an open air pavilion. Currently the building is underutilized and the conversion will open up its usage.</p> <p>\$10,000 from the Village’s CDBG allocation is allocated to the project.</p> <p>Amherst will also replace in-accessible sidewalks with ADA compliant ramps within the Eggertsville and Opportunity Zone target areas. Ramps will be installed in conjunction with sidewalk repairs. \$20,000 is allocated to ADA sidewalk ramps for PY 2020.</p> <p>Amherst will also provide rehabilitation work to the newly purchased Youth Center to serve Amherst teens and youth with social/recreational programming. The building will also serve community groups for public special events. Funds will provide repairs and renovations to the building to bring it into code compliance for use as the new Youth center.</p> <p>\$30,000 in CDBG Entitlement and \$10,000 in CDBG Program Income will be allocated to the Youth Center Rehab in PY 2020. If additional CDBG Entitlement funds are received in 2020 up to \$30,000 additional CDBG EN funds will be allocated here.</p>
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AP-35 Projects - 91.420, 91.220(d)

Introduction

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

#	Project Name
1	Amherst CDBG Housing Rehabilitation
2	CDBG General Program Administration
3	CDBG Office Expenses
4	Public Information and Advertising
5	Lead Based Paint Testing and Clearance
6	Weatherization Program for Single Family Homes
7	Belmont Housing Counseling Services
8	Buffalo Urban League Foreclosure Prevention Services
9	Fair Housing Counseling through H.O.M.E.
10	Boys and Girls Club Afterschool Program
11	Village of Williamsville Section House
12	Village of Williamsville Glenn Park Nature Center Conversion
13	YWCA, Inc. Transitional Housing
14	Community Policing Engagement Events
15	Family Justice Center Signage & Outreach
16	ADA Sidewalk Ramps
17	Amherst Housing Rehabilitation (HOME) funds
18	Amherst First-time Homebuyer Program (HOME)
19	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME & CDBG)
20	Amherst HOME Rental Subsidy
21	Amherst HOME Administration
22	Tonawanda Acquisition-Rehabilitation/New Construction-Resale (HOME)
23	Tonawanda Residential Rehabilitation (HOME)
24	Tonawanda First-time Homebuyer Closing Cost Assistance (HOME)
25	Tonawanda HOME Administration
26	Cheektowaga Housing Rehabilitation (HOME)
27	Cheektowaga CHDO Acquisition-Rehabilitation/Acquisition-New Construction/Resale (HOME)
28	Cheektowaga First-time Homebuyer Program (HOME)
29	Cheektowaga HOME Administration
30	Cheektowaga HOME Rental Subsidy
31	ASTS Senior Van

#	Project Name
32	Amherst Youth and Recreation Center

Table 3 – Project Information

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

See Strategic Plan Narrative

AP-38 Project Summary
Project Summary Information

1	Project Name	Amherst CDBG Housing Rehabilitation
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A Residential Rehab-Owner occupied Rental *A Handicapped Accessibility *A Residential Rehab-Owner-Occupied Military Grant *A
	Funding	CDBG: \$258,831
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. (\$142,431 CDBG Rehab; \$116,400 Rehab Payroll - total \$258,831); Anticipated \$146,225 CDBG Program Income received FY20 to supplement entitlement funds. CDBG housing rehab for 2020 will be accomplished with entitlement funds and program income. The Town's State AHP Grant will supplement the funding in target areas.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will benefit from this program.
	Location Description	Town-wide. If additional state grant funds are received, they'll be applied as match to target areas.
Planned Activities	HUD Matrix Code 14A Housing rehabilitation for needed repairs to bring properties to code and provide safe secure housing units. These repairs may include structural or mechanical systems such as roofing, siding, insulation, windows, doors, electrical and plumbing.	
2	Project Name	CDBG General Program Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$108,000

	Description	These funds are used for staff administration of the CDBG Grant. \$108,000 will be utilized from entitlement funding and \$8,000 from anticipated program income.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21A Administration of all CDBG funded activities.
3	Project Name	CDBG Office Expenses
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$1,200
	Description	Office supplies, copying costs and mailing expenses for administration of CDBG Programming.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
Planned Activities	HUD Matrix Code 21B General office supplies	
4	Project Name	Public Information and Advertising
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	CDBG: \$2,000

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

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

	Description	Belmont Housing Resources for WNY, Inc. is a HUD certified counseling agency that will provide tenant, pre-purchase, post-purchase, foreclosure, reverse mortgage and mortgage default counseling services to low-moderate income residents.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	~150 households or individuals will benefit from the counseling and financial education offered by the program.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code: 05K Counselors from Belmont Housing Resources for WNY, Inc. (Belmont) will offer financial education classes and individual financial and landlord/tenant counseling to first time homebuyers two times per month in Amherst Town Hall as well as at the Main Street (Buffalo) offices of Belmont. These counseling services include credit counseling, reverse mortgage information, mortgage default and foreclosure prevention and landlord-tenant rights information as well as first time homebuyer assistance.
8	Project Name	Buffalo Urban League Foreclosure Prevention Services
	Target Area	Town Wide
	Goals Supported	Provide Assistance to At-Risk Population
	Needs Addressed	Hsg Counseling & Foreclosure Prevention Assist *A
	Funding	CDBG: \$8,000
	Description	Counseling and legal assistance for income eligible Amherst Homeowners to avoid mortgage default and/or predatory lending situations. Additional assistance is available for credit counseling and credit restructuring and foreclosure prevention.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will benefit from the credit counseling and foreclosure prevention services offered by the Buffalo Urban League.
	Location Description	Town-wide

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

	Needs Addressed	Public Services - Youth Services *A
	Funding	CDBG: \$37,000
	Description	The Boys & Girls Club Program serves low income youth residing in Allenhurst Apartments, Princeton Court Apartments, and other Eggertsville neighborhoods adjacent to the Windermere Elementary School area (a target area for the town). The after-school program provides educational, social and recreational opportunities to approximately 55 children per day, designed to support the families and enhance the children's potential to succeed in school and the community, in a safe environment for the children. CDBG funds will cover the cost of staff for the after-school program.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 50 youth from low-mod households will be assisted at the Eggertsville Community Center after school program each day and the summer program.
	Location Description	Eggertsville
	Planned Activities	HUD Matrix Code 05D The After School Program provides educational, social and recreational programs for children in a safe environment. CDBG funding covers the cost of staff people for the after school activities.
11	Project Name	Village of Williamsville Historic Section House
	Target Area	Town Wide
	Goals Supported	Historic Preservation/Elimination of Slum & Blight
	Needs Addressed	Historic Preservation *A
	Funding	CDBG: \$33,620
	Description	The Village of Williamsville is allocated 7% of Amherst's annual CDBG funding. Funding will be directed to stabilizing the Historic Village Section House on the former railroad line within the Village. The Village has decided to commit their CDBG allocation to this activity. Any increase or decrease in CDBG funding will be reflected in this share of CDBG funding.
	Target Date	3/31/2021

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

	Goals Supported	Provide Assistance to At-Risk Population
	Needs Addressed	Assist Victims of Domestic Violence *A
	Funding	CDBG: \$25,000
	Description	Four households in designated homes in the northwest portion of the Town will receive services including case management and transportation assistance. The supportive housing provides shelter for low-income domestic violence victims/battered spouses and their children (four adult females and fourteen children). The CDBG funds are being used to pay for bus passes and for a portion of case management salaries.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Four households.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 05G Public service activities including case management to address barriers and regain self-sufficiency, and transportation for domestic violence victims. Transitional housing and supportive service programming for homeless women and their children.
14	Project Name	Community Policing Engagement Events
	Target Area	Town Wide
	Goals Supported	Community Services
	Needs Addressed	Community Policing *A
	Funding	CDBG: \$8,000
	Description	The Amherst Police Department together with the Amherst Recreation Department will continue to build relationships with area youth through community events with the police, such as movie nights, basketball games, etc. The Community Policing activities are expected to reach over 200 people.
	Target Date	3/31/2021

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

	Needs Addressed	Neighborhood Beautification/Public Infrastructure Handicapped Accessibility
	Funding	CDBG: \$20,000
	Description	Replace in-accessible sidewalks with ADA compliant ramps within the Eggertsville and Opportunity Zone target areas. Ramps will be installed in conjunction with sidewalk repairs.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 area residents will be served by the ADA improvements.
	Location Description	Eggertsville Opportunity Zone
	Planned Activities	HUD Matrix code 03L Improvements to sidewalks.
17	Project Name	Amherst Housing Rehabilitation (HOME)
	Target Area	Town-wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A Residential Rehab-Owner occupied Rental *A Handicapped Accessibility *A Residential Rehab-Owner-Occupied Military Grant *A
	Funding	HOME: \$141,685
	Description	Deferred interest free loans up to \$20,000 to low-moderate income homeowners to undertake necessary repairs to their homes. Anticipated \$141,685 HOME EN and \$30,000 HOME Program Income received FY20 to supplement entitlement funds. The Town's State AHP Grant will supplement the funding in target areas.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households will be assisted.
	Location Description	Town wide
	Planned Activities	HUD Matrix Code 14A Housing rehabilitation for needed repairs to bring properties to code and provide safe secure housing units. These repairs may include structural or mechanical systems such as roofing, siding, insulation, windows, doors, electrical and plumbing.
18	Project Name	Amherst First-time Homebuyer Program (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Homebuyer Assistance for Affordable Hsg *A
	Funding	HOME:
	Description	Closing Cost Assistance is provided in the form of a 0% deferred loan to income eligible first time home buyers in the Town and Village of Williamsville. Eligibility is for households less than 80% AMI based upon 2019 HUD Income Guidelines. This activity will be supplemented with HOME program income received from previous closing cost assistance loans. No HOME EN funds will be applied to this program in 2020, as \$35,840 remains from prior year allocations.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately four first time homebuyer households will be assisted in 2020. Previous years' funding available.
	Location Description	Town-wide
	Planned Activities	Matrix Code 13 Direct Homeownership assistance to LMI households.
19	Project Name	Amherst Acquisition-Rehabilitation/New Construction-Resale (HOME & CDBG)
	Target Area	Town Wide

	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Acquisition Rehabilitation Resale *A
	Funding	CDBG: \$30,000 HOME: \$140,000
	Description	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, or acquisition of a vacant lot and new construction of a single-family house for resale to an income eligible first-time homebuyer. Amherst will acquire at least one home or vacant lot in 2020, allocating \$30,000 in CDBG EN funding for acquisition, \$140,000 of 2020 HOME EN funding and supplementing it with the sale proceeds from 391 Grover Cleveland (\$60,000 in HOME Program Income) for the rehab and resale portion of the project. The owner/developer to manage the rehabilitation or new construction of the property may be a CHDO.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	One eligible first time homebuyer household will benefit from the resale of a rehabilitated property. The neighborhood will also benefit from the rehabilitation of the property or in-fill development that occurs.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14G One home will be rehabilitated or a new home constructed and sold to a first time homebuyer through a non-profit owner/developer. A purchase subsidy will be available to supplement the closing cost homebuyer assistance, to make the home more affordable.
20	Project Name	Amherst HOME Rental Subsidy
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	HOME Construction Rental Subsidy – Special Populations
	Funding	HOME:
	Description	The Amherst HOME Rental Subsidy provides a long-term deferred 0% loan towards the construction of new affordable rental housing development serving LMI seniors, disabled, special populations within the Town of Amherst. For 2020, \$90,000 in PI HOME funds are allocated towards the program.

	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 new affordable rental units will be created, serving 1 household.
	Location Description	Town-wide
	Planned Activities	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
21	Project Name	Amherst HOME Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	HOME: \$93,895
	Description	Funds for staff and office costs for oversight and implementation of HOME activities: \$93,895. This figure is 10% of the expected total HOME Consortium allocation. The admin. funding will be supplemented with Amherst HOME Program Income; \$20,0000 for a total of \$113,895. Increases in 2020 allocation will be applied to the HOME Admin budget line in accordance with percentages allowed.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code: 21H Oversight and administration of the HOME Investment Partnership Grant for the Amherst HOME Consortium.
22	Project Name	Tonawanda Acquisition-Rehabilitation/New Construction-Resale (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Home Ownership
	Needs Addressed	Acquisition Rehab/New Construction Resale

	Funding	HOME: \$100,000
	Description	Acquisition and rehabilitation of an existing vacant, deteriorated single family house in a target neighborhood, and resale to an income eligible first-time homebuyer. Tonawanda will acquire at least one home in 2020, allocating \$100,000 in 2020 HOME EN funding for the rehab and resale portion of the project. The owner/developer to manage the rehabilitation or new construction of the property may be a CHDO.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1 household will benefit from the rehab and purchase of the home.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14G One home will be rehabilitated or a new home constructed and sold to a first time homebuyer through a non-profit owner/developer. A purchase subsidy will be available to supplement the closing cost homebuyer assistance, to make the home more affordable.
23	Project Name	Tonawanda Residential Rehabilitation (HOME)
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A
	Funding	HOME: \$161,685
	Description	The Town of Tonawanda will allocate \$161,685 of FY2020 HOME EN and approximately \$90,000 of Program Income to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) in the Town-excluding the Village of Kenmore-for necessary repairs to their homes.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately seven income eligible households will be assisted in the Town of Tonawanda.

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

	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21H Staff costs for the administration of Tonawanda HOME activities for 2020.
26	Project Name	Cheektowaga Housing Rehabilitation (HOME)
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	Residential Rehabilitation-Owner-Occupied *A
	Funding	HOME: \$161,685
	Description	The Town of Cheektowaga will allocate \$161,685 of FY2020 HOME EN to provide a 0% deferred payment loan to low-moderate income homeowners (income is below 80% of the HUD area median income) for necessary repairs to their homes.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 low and moderate income homeowners will be assisted.
	Location Description	Town-wide
	Planned Activities	HUD Matrix Code 14A Housing Rehabilitation for needed repairs to bring properties up to code and provide safe secure housing.
27	Project Name	Cheektowaga CHDO Acquisition-Rehabilitation/Acquisition-New Construction/Resale (HOME)
	Target Area	Town Wide
	Goals Supported	Promote Affordable Homeownership
	Needs Addressed	Acquisition Rehabilitation Resale *A

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

29	Project Name	Cheektowaga HOME Administration
	Target Area	Town Wide
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	:
	Description	The Town of Cheektowaga will use 10% of its HOME program income received in 2020 for admin funding for staff to administer the HOME program. Estimated at \$10,000 in PI.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	HUD Matrix Code 21H Costs associated with administration and delivery of HOME funded activities. 10% of Cheektowaga's HOME program income will be used for this activity.
30	Project Name	Cheektowaga HOME Rental Subsidy
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock
	Needs Addressed	HOME Construction Rental Subsidy – Special Populations
	Funding	HOME:
	Description	The Cheektowaga HOME Rental Subsidy provides a long-term deferred 0% loan towards the construction of new affordable rental housing development serving LMI seniors, disabled, special populations within the Town. For 2020, \$400,000 in prior year and current year PI HOME funds are allocated towards the program.
	Target Date	3/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4-6 Units of Affordable Rental housing new construction or renovation will be created, serving 4-6 households.
	Location Description	Town-wide
	Planned Activities	A building will either be converted into affordable rental housing or newly constructed units will be developed with the funding.
31	Project Name	ASTS Senior Van
	Target Area	Town Wide
	Goals Supported	Community Services
	Needs Addressed	Senior Services
	Funding	:
	Description	Amherst Senior Transportation Services will utilize \$5,775 in Program Income towards the purchase of a Van. The Van provides transportation services for Amherst's elderly population to medical appointments, social activities, and public facilities.
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,000 people are served annually from the van services.
	Location Description	Town-wide
	Planned Activities	Matrix code 5A Provide transportation services for seniors and disabled seniors.
32	Project Name	Amherst Youth and Recreation Center
	Target Area	Town Wide
	Goals Supported	Public Facilities and Infrastructure
	Needs Addressed	Neighborhood Beautification/Public Infrastructure
	Funding	CDBG: \$10,000

Description	CDBG funding will be used to rehabilitate a newly purchased building on Sheridan Drive in Amherst to create a Youth and Recreation Center. \$30,000 in CDBG EN and an additional \$10,000 in 2020 Program Income will be allocated, as well as up to an additional \$30,000 in CDBG entitlement funds only if an increase in the anticipated allocation is received.
Target Date	3/31/2021
Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 persons will be served annually from the facility.
Location Description	Town-wide
Planned Activities	Matrix Code 3D Rehab of a Youth center facility.

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

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

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

Geographic Distribution

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

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Egbertsville target area has the highest percentage of assistance as it is the older part of the town and the housing stock needs more attention to maintain. The higher percentage of low-mod income households are also concentrated in this area of the Town. Finally, acquisition-rehab, façade improvements, and Land Bank activities are concentrated in this area.

Amherst's Opportunity Zone area focuses on Census Tract 92, which is almost entirely consisted of qualifying LMI block groups. The degradation of the Boulevard Mall has severely impacted employment in the area and the loss of area commercial use has seen an increase in vacant commercial buildings. Without a renewed effort to provide programming to address the economic conditions in the Boulevard Mall area, the town will see decline reverberate outward into the surrounding LMI homestead neighborhoods, which are already in poor shape.

Discussion

Affordable Housing

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

Introduction

The highest percentage of CDBG and HOME funds are directed to providing and improving the existing residential housing units with some acquisition and rehab of affordable housing units in the Consortium Towns. Amherst and Cheektowaga do not receive homeless assistance through ESG, but relies on the Homeless Alliance of WNY and Belmont Housing Resources for WNY, Inc. (PHA for Housing Choice Voucher Program/Section 8 rental assistance) to assist those at risk of homelessness. The Town of Tonawanda anticipates receiving ESG funds and is expected to assist approximately 15 homeless individuals in 2020. Housing Rehabilitation is the largest activity for retaining affordable housing stock throughout the Consortium.

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

Table 5 - One Year Goals for Affordable Housing by Support Requirement

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

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

Amherst

The Town will be acquiring a vacant property on Grover Cleveland Highway for rehabilitation of a single-family home and resale to a low-mod household. In 2020 the town will also acquire a vacant parcel on Sunset Court to construct a three bedroom home to sell to an eligible first-time homebuyer. The majority of the housing funds will be used for rehabilitation of income-eligible existing owner-occupied units through a 0% deferred loan program. The program will also assist approximately four first-time income eligible homebuyers with closing cost assistance in the form of a 0% deferred loan. Lastly, a subsidy of \$100,000 will be provided to a non-profit developer to create 1-2 new affordable rental housing within the Town.

Cheektowaga

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

Tonawanda

At this time Tonawanda's HOME funds are only utilized for a first-time homebuyer program and a residential rehab program for existing owner-occupied units. In 2020, Tonawanda also intends to use HOME funds to rehabilitate a home which is to be acquired by the Town via other funding sources. The home will then be sold to a low- to moderate-income first time homebuyer. Due to the severe need for decent, affordable rental units, Tonawanda is willing to entertain the idea of subsidizing the creation of affordable rental units (likely as part of a school or public facility conversion project) using HOME funds should the opportunity present itself. Tonawanda's CDBG funding for affordable housing focuses on residential owner-occupied rehab, housing counseling services provided by Belmont Housing of WNY, and weatherization services. Tonawanda's ESG Rapid Rehousing Program rounds out the remainder of the program offerings and is discussed separately in Tonawanda's Action Plan.

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AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The Towns of Amherst and Cheektowaga do not have public housing developments that the municipalities own. Multi-family rental units are owned privately and units are available with rental assistance through project specific vouchers or Section 8 rental assistance. There are approximately 10 subsidized housing complexes in Amherst and an additional four developments of affordable rental units that are not subsidized but below market rate. There are 8 low income housing apartment communities offering 471 affordable apartments for rent in Cheektowaga. Cheektowaga features 187 low income apartments with rental assistance where households typically pay no more than 30% of their income towards rent. Additionally, there are 284 other low income apartments that don't provide direct rental assistance but remain affordable to low income households in Cheektowaga.

Within the Town of Tonawanda, the Kenmore Housing Authority (KHA) has 194 units of public housing located in two mid-rise adjacent buildings with 97 units in each building. Up until 2006, the KHA administered 20 Section 8 Rental Vouchers for low-income families and the elderly. The Authority has since transferred that authorization to Belmont Housing Resources of WNY. The Authority is located at 657 Colvin Boulevard in the Village of Kenmore, New York. The Authority normally maintains full occupancy. There are 10 handicapped units in each building and there are no handicapped tenants in residence who need to be transferred to a handicapped unit. In terms of income, 50 percent of the tenants qualify as very low income being under 31 percent of the median income for the metropolitan area, 25 percent as low-income at 31-50 percent of the median income and 25 percent qualify as moderate income at 51-80 percent of the median income. Residents pay 30 percent of their income for rent. Additionally, HUD annually allots funds to cover all costs for operation and maintenance of the buildings. There are approximately 500 applicants on the Kenmore HA waiting list, including 200 applicants who qualify as handicapped. The KHA also has adopted a local preference ruling whereby all Village of Kenmore residents receive first priority, Town of Tonawanda residents receive second priority and all other applicants are placed on a third waiting list.

Actions planned during the next year to address the needs to public housing

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

Cheektowaga will continue to utilize existing neighborhoods to develop in-fill housing projects for low/moderate income home ownership. Cheektowaga will continue to acquire, rehabilitate, and resell affordable homes with the assistance of the Buffalo Erie Niagara Land Improvement Corporation

(BENLIC) through their ability to acquire vacant and distressed tax foreclosed properties. Also, Cheektowaga collaborates with Habitat for Humanity to sell their organization Town owned residential lots within neighborhoods to construct new affordable homes for their program. Habitat also collaborates with BENLIC to acquire vacant lots from the land bank through tax foreclosure auctions. Two separate developers have approached the Town for the development of an 89 unit and 66 unit tenant based affordable senior housing rental complexes using existing structures. Home funds will be utilized towards both projects which are also contingent on New York State HCR tax credit funding.

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

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Amherst, Cheektowaga, and Tonawanda all work with our non-profit developers under HOME-funded programming to ensure that homeownership programs are advertised to and available to public housing residents, through direct mailers, postings in public housing complexes, and advertising in local minority papers. Such programs include First-time Homebuyer classes, First-time Homebuyer Closing Cost Assistance, and Financial Counseling. Also, Acquisition-Rehab/New Construction/resale projects are directly advertised to public housing residents via Belmont Housing Resources for WNY, since recipients of Section 8 vouchers, as the vouchers can be applied towards the mortgage.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

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

Introduction

The Town does not receive any direct homeless assistance but relies on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Housing Choice Voucher/Section 8 emergency housing assistance.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for several people identified as being homeless in the Town. Amherst's Meals on Wheels Program has also stepped forward in these cases to provide daily meals. Community Development Block Grant funds may be made available to the Amherst Meals on Wheels program to provide healthy nutritious meals to the Town's identified homeless individuals or families if requested. The 2020 Action Plan goals do address assisting frail elderly and those at-risk of homelessness.

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

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

Amherst's CDBG funding also supports the YWCA housing for families affected by domestic violence. In many instances the clients are coming from a place of homelessness and are referred to the YWCA once assistance limits are up at the HOPE House, a homeless shelter in the East Side of Buffalo. When the Y becomes involved the clients receive more self-sufficiency assistance to be able to sustain themselves and their families over the long-term, than would otherwise be provided through HOPE House.

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

Addressing the emergency shelter and transitional housing needs of homeless persons

As mentioned before, grant funds are available to assist victims of domestic violence in emergency

situations through the Town of Amherst Family Offense Unit of the Police Department. Additional funds provide support through the YWCA for four units of Transitional Housing in the Town for families re-establishing themselves after the disruption of domestic violence and homelessness. Funds are used for case management and transportation.

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

Low and moderate income households sometimes find themselves in a situation where they "lose ground" in terms of their housing situation. The Town will continue to develop its programs that assist existing low and moderate income residents so that they can maintain their current residential situations. This includes homeowner rehabilitation assistance and weatherization assistance for owners and renters.

The Town will contract with Belmont Housing Resources for WNY, Inc. and Buffalo Urban League to provide advocacy and counseling to homeowners who are refinancing homes in order to consolidate consumer debt. The Town will also provide a copy of relevant HUD brochures, and refer residents to Belmont and Buffalo Urban League when past housing rehabilitation clients seek to refinance their homes.

Additional services are provided through Belmont for credit and mortgage default counseling and the Buffalo Urban League for legal assistance for foreclosure prevention and loan modification for homeowners at risk of losing their homes through job loss, costly medical emergencies, etc.

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

The Erie County Fair Housing Partnership provides a forum to identify and discuss solutions to current fair housing issues. This organization deals with sub-prime lending activities which may be legal, but which often set up low and moderate income homeowners to become overburdened with debt and lose their homes to foreclosure. They also offer counseling and legal assistance to homeowners facing foreclosure. Community Development staff has worked with the Partnership to develop workshops on mortgage loans, mortgage modification and foreclosure prevention in order to better prepare and

educate potential homebuyers and current homeowners involved in home buying activities, refinancing or mortgage modification.

The Town will contract for the provision of housing counseling activities to homebuyers, homeowners and renters through Housing Opportunities Made Equal. This counseling will educate residents on their personal responsibilities in managing their financial affairs to maintain a healthy credit rating, as well as their opportunities to improve their own financial circumstances.

Discussion

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Chronic Homelessness

The Town's Community Development staff participates in the Homeless Alliance for WNY's (HAWNY) NY-508's 10 year planning to address homelessness in WNY. HAWNY's plan for Erie County, "*Opening Doors: Buffalo and Erie County's Plan to End Homelessness (2012)*", was also recently updated in 2016. Among the priorities it sets for the community are: permanent housing for the chronically homeless, permanent housing for clients dealing with mental illness and/or substance abuse issues (MICA) clients.

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

The Town of Amherst continues to act as the lead applicant PHA for the Erie County PHA Consortium. In this role the Town contracts with Belmont Housing Resources WNY to act as the management agent for the day-to-day operation of the Section 8 Housing Choice Voucher Program. (It should also be noted that Belmont acts as a participant in the Prism Project Forum.) The PHA has a set-aside of rent vouchers for the homeless and also for youth aging-out-of-foster care, who have higher rates of homelessness. Crisis Services refers eligible clients to Belmont for these rent subsidies.

The PHA also has vouchers under the VASH (Veterans Administration Supportive Housing) program. These are available to homeless veterans with substance abuse/mental health issues. The Homeless Outreach program through the local VA hospital is a very involved partner with Belmont in linking these rent subsidies with follow-up care to providing a stabilizing force in these persons' lives (community-oriented outreach, clinical care and case management services).

Transitional Services, Inc. operates a community residence for 13 adults on North Ellicott Creek Road in the Town of Amherst. The agency provides opportunities for community living for persons with mental health issues. Staff provides individual assessment, rehabilitation services, case management and supportive counseling to each unique individual. The Town of Amherst is also host to sixty-three (63) group homes for the developmentally disabled.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the

return on residential investment

Amherst is currently undergoing changes to its residential, commercial and office space markets. While housing values soar, commercial and office demand is decreasing and demographics are shifting. The town is aging as well. To address these changes, the Town is reimagining itself in a project called Imagine Amherst. Imagine Amherst has been working with residents and technical committee over the past four years to revise guiding language in the comprehensive plan to address commercial development's form and mixture of uses in older commercial clusters in town. The changes to the comprehensive plan were recently adopted in December 2017. In 2019, the Town adopted changes to its zoning code to implement Imagine Amherst for the Opportunity Zone section of Town (Census Tract 92).

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

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

Discussion

The Town continues its program to rehabilitate existing low-income, owner-occupied, single-family and two-family housing by providing a 0% interest deferred payment loan through the CDBG and HOME Programs. Approximately 35 single-family units and two two-family unit will be rehabilitated. (Town/Village-wide)

Through the Consortium's partnership with New Opportunities Community Housing Development Corp. Amherst will acquire and rehabilitate or build at least one home in the Town to be resold to first-time homebuyers. This property will be made affordable to an income-eligible homebuyer below 80% Area Median Income using HOME funds.

Weatherize existing low income owner occupied housing and rental housing (excluding multi-unit complexes) units through the Weatherization Assistance Program funded by the Department of Energy and administered through Supportive Services Corporation. Approximately 25 Amherst units will be weatherized, using current year's and previous years' funds. (Town/Village-wide)

The Town will continue to support the activities of the Erie County Fair Housing Partnership and will

actively participate in a 2020 Conference and other activities scheduled for April, Fair Housing Month. The Town of Amherst also has a very active Committee on Disabilities that has addressed ADA compliance in all Town facilities and will be directing its efforts, along with Town departments, to establishing a Town Policy on ADA compliance and accessibility throughout the Town. Fair Housing counselors are noting an increased rate of discrimination reports from persons with disabilities that are trying to find housing in the Town. The Town's CDBG and HOME housing programs do offer rehabilitation loans to single family homeowners and owner occupied two family units to provide accessibility repairs.

The Town of Amherst will continue to act as the lead PHA for the Erie County PHA Consortium, acting as a conduit for Section 8 rental subsidies for eligible, very low income households in Erie County.

Continue to support:

Eligible applications for newly created rental units for low-income visually and/or physically impaired residents.

An application for new rental units for low income elderly through the Section 8/Section 202 New Construction Program if funding becomes available.

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

Introduction

The Consortium communities recognize that housing programs by themselves will not eliminate or reduce poverty. Subsidized programs such as targeted in the Consortium Consolidated Plan can free up cash resources for living necessities, but these programs alone cannot raise a household above the poverty level.

The Consortium Towns, understanding the importance of coordination between public and private housing and social service agencies, have developed the Consolidated Plan through consultation and cooperation with such agencies. In doing so, the Towns have established a working relationship with numerous social and housing service providers which will serve as a foundation for coordination and cooperation in the implementation of the Annual Action Plan. Acknowledging that each agency plays a specific role in providing different types of services, the Towns will adhere to a policy of encouraging ongoing communication, referrals and exchange of information among these agencies. Such a policy will allow the Towns to serve as catalysts to help ensure that the full range of appropriate resources are made known and available to service agencies in order to provide a thorough and complete approach to meeting priority housing, social and health needs of low income persons.

Where appropriate and feasible, the Consortium Towns will coordinate their housing programs with services designed to assist low income households to break the cycle of poverty.

Actions planned to address obstacles to meeting underserved needs

The Town of Amherst acts as lead PHA for the Erie County PHA Consortium. In this capacity, it contracts with Belmont Housing Resources for WNY to administer the Section 8 rent subsidy programs in Erie County. The Erie County P.H.A. has established an Action Plan for the Family Self-Sufficiency Program. This program provides rent subsidies to eligible households in concert with other social services and programs on terms that encourage personal responsibility leading to financial independence.

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

The bank financing for home repair loans for low and moderate income persons reduces the amount of their disposable income with the potential of placing the low and moderate income person into poverty. The Consortium Towns offer a 0% deferred payment loan to low and moderate income

persons to make house repairs which is payable when the house is sold.

In addition, Erie County's work force development offices provide training and employment opportunities to:

Economically disadvantaged adults who need training and job skills to secure employment.

Dislocated workers who are economically disadvantaged and have been laid off and are waiting to be recalled to the same or similar occupation, for example, a steel worker.

Provide a summer job to youth who are from low and moderate income families along with on-the-job education classes for the duration of their job.

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

Actions planned to foster and maintain affordable housing

The Consortium Towns will continue to undertake housing rehabilitation, acquisition-rehab-resale projects, and first time homebuyer activities. Additionally, Amherst funds and coordinates with agencies that provide housing counseling, foreclosure prevention, landlord-tenant education, and housing and services for victims of domestic violence. By focusing on geographic target areas with low-mod populations, and assisting low-mod income households, the Town assists residents with various aspects of obtaining and maintaining affordable housing. New in recent years is the addition of a subsidy to non-profit developers to foster new rental housing for LMI populations in Amherst and Cheektowaga.

Beginning in FY2019 The Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium has also established our own HOME Value Limits as outlined in 24 CFR §92.254 (a)(2)(iii) to establish a new HOME Value Limit for 1-unit existing structures. Over the last several years there has been a tremendous increase in housing values in the Towns of Amherst, Cheektowaga and Tonawanda. The ACT HOME Consortium has had difficulty utilizing HOME Investment Partnership funding for our Homeowner Rehabilitation Programs due to the increase in housing values above these limits. The current value limits also greatly affect low-income seniors in need of home repairs, as most often their home's assessed values exceed these limits.

In addition, it has become increasingly difficult to perform a HOME-funded Acquisition-Rehab-Resale project and keep the rehabilitated home under these value limits, even in lower-income areas. As a result the Consortium is limited in its ability to provide affordable housing programming in middle-to-

higher-income neighborhoods for rehabilitated homes will appraise higher than these value limits.

To establish our HOME Value Limits an initial market analysis was conducted in accordance with 24 CFR §92.254 (a)(2)(iii) for 1-unit existing homes. The resulting Home Value Limit is \$174,800. The methodology applied included collecting sales data from each Town Assessor for the months of June and July 2019 for single-family homes (Code 210) with arms-length sales. The number of sales were 286 in June and 353 in July; resulting in the need for only two months of sales data for the analysis. The median sale value of the data set is \$184,000, that figure multiplied by 95% generates the value limit of \$174,800. The corresponding spread sheet with the Assessors' data used to arrive at this figure is available for review at the Amherst Planning Department.

The ACT Consortium has requested HUD's approval of this methodology and received approval for the established 1-unit Existing Structure HOME Value Limit. The Consortium will continue to use the HUD established HOME Value limits for the remaining 2-unit, 3-unit and 4-unit for existing homes, and for 1-4 units for all new builds.

It should also be noted that the Consortium only intends to apply the new (existing home) Home Value Limits to our Homeowner Rehab Programs and Acquisition-Rehab-Resale Projects, as this value is unaffordable to families seeking First-Time Homebuyer Closing Cost Assistance. This will rule will be applied as an internal policy. We will also continue to provide a purchase subsidy on the Acquisition-Rehab-Resale projects to ensure the home value is affordable to low-income homebuyers.

Actions planned to reduce lead-based paint hazards

The Consortium Towns will continue to undertake the following action to control lead based paint hazards during Fiscal Year 2020.

Houses built prior to 1978 showing deteriorated paint surfaces, exterior and interior, will be tested and if lead based paint is found it will be addressed. The three towns have sponsored renovators' and remodelers' training for housing rehabilitation contractors offering certifications for inspections and procedures. Also, the Community Development offices will continue to notify contractors of new education/training opportunities offered during the year for the federally required interim control procedures.

Actions planned to reduce the number of poverty-level families

There is currently no economic development or job training program available in the Town directly through CDBG funding. However, the assistance provided through the other CDBG programs to lower-income households will relieve some of the financial burden and provide affordable options for housing,

thus reducing some of the strain on household budgets.

Actions planned to develop institutional structure

N/A

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

N/A

Discussion

Program Specific Requirements

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

Introduction

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	50,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	50,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	79.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The Towns of Amherst, Cheektowaga and Tonawanda, through the A-C-T HOME Consortium, expect to receive HOME Investment Partnership Grant funds that will be used to rehabilitate owner-

occupied homes needing repair and assist income-qualified first-time homebuyers by providing the money needed to cover closing costs and or down payment assistance. This homebuyer assistance may enable previously underserved rental households to consider the possibility of home-ownership. The outreach activities in support of first-time homebuyer assistance will include advertising, informational workshops, financial education and additional counseling with follow-up post-purchase counseling to further ensure the success of homeownership.

Five Year goal:	50 low-mod income	<u>A</u>	<u>C</u>	<u>I</u>
	first-time homebuyers assisted	20	20	10
2020 goal:	low-mod homebuyers assisted	4	4	2

5-Yr. Sect. 215 goal: 50 low-mod income homebuyers assisted

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Amherst, Cheektowaga, Tonawanda HOME Consortium does not incorporate RESALE provisions in any of the HOME activities.

The Consortium Towns will utilize the “Shared Net Proceeds” **recapture** provision for the repayment of these loans in the event there are insufficient funds to repay the loan and homebuyer equity at the time of future resale of the property. See 24 CFR 92.254(a)(5)(ii)(A)(3).

Under the recapture option, the PJ recovers all or a portion of the HOME assistance to the homebuyers, if the housing does not continue to be the principal residence of the qualified low-income family that purchased the unit for the duration of the period of affordability.

The PJ and the homebuyer share the net proceeds based upon the ratio of the HOME subsidy to the sum of the homebuyer's investment plus the HOME subsidy.

As per the written HOME Agreements for the Amherst, Cheektowaga, Tonawanda Consortium’s Homebuyer Program:

“If the HOMEBUYER either sells the PROPERTY or gives up residence at the PROPERTY, he/she shall repay to the TOWN the full amount of the affordable housing subsidy. He/she shall make this repayment to the TOWN within ninety (90) days of his/her sale of the PROPERTY or termination of residency at the PROPERTY. However, if the PROPERTY is sold and the sales price minus the cost of repaying the first mortgage and minus closing costs is insufficient to repay both the full amount of the affordable housing subsidy and the HOMEBUYER’S investment, then the HOMEBUYER shall repay the TOWN only a pro-rated portion of the affordable housing subsidy. In such a case, the pro-

rated portion the HOMEBUYER shall repay to the TOWN shall equal the amount yielded by the following formula:"

$$\frac{\text{HOME investment}}{\text{HOME investment} + \text{HOMEBUYER investment}} \times \text{Net Proceeds} = \text{HOME amount to be recaptured}$$

HOME investment + HOMEBUYER investment

GEOGRAPHIC LOCATION: Townwide in each of the three Towns, including the Villages, in the Consortium.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The Towns of the Amherst HOME Consortium do not use the Resale guidelines.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to utilize HOME funds to refinance existing debt secured by multifamily housing.