

**Town of Amherst**

**DRAFT**

**2025-2029 Five-Year Consolidated Plan**



**Community Development Block Grant and  
HOME Investment Partnership Grant**

**Amherst-Cheektowaga-Tonawanda (ACT) Consortium**

# Town of Amherst 2025-2029 Five-Year Consolidated Plan

## Contents

<b>Executive Summary</b> .....	
<b>ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)</b> .....	<b>4</b>
<b>The Process</b> .....	
<b>PR-05 Lead &amp; Responsible Agencies - 91.200(b)</b> .....	<b>9</b>
<b>PR-10 Consultation - 91.100, 91.200(b), 91.215(l)</b> .....	<b>10</b>
<b>PR-15 Citizen Participation - 91.401, 91.105, 91.200(c)</b> .....	<b>14</b>
<b>Needs Assessment</b> .....	
<b>NA-05 Overview</b> .....	<b>18</b>
<b>NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)</b> .....	<b>19</b>
<b>NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)</b> .....	<b>28</b>
<b>NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)</b> .....	<b>32</b>
<b>NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)</b> .....	<b>36</b>
<b>NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)</b> .....	<b>38</b>
<b>NA-35 Public Housing - 91.405, 91.205 (b)</b> .....	<b>41</b>
<b>NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)</b> .....	<b>43</b>
<b>NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)</b> .....	<b>48</b>
<b>NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)</b> .....	<b>52</b>
<b>Housing Market Analysis</b> .....	
<b>MA-05 Overview</b> .....	<b>55</b>
<b>MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&amp;(b)(2)</b> .....	<b>57</b>
<b>MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)</b> .....	<b>61</b>
<b>MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)</b> .....	<b>64</b>
<b>MA-25 Public And Assisted Housing - 91.410, 91.210(b)</b> .....	<b>66</b>

<b>MA-30 Homeless Facilities and Services - 91.410, 91.210(c)</b> .....	<b>68</b>
<b>MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)</b> .....	<b>72</b>
<b>MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)</b> .....	<b>75</b>
<b>MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)</b> .....	<b>77</b>
<b>MA-50 Needs and Market Analysis Discussion</b> .....	<b>85</b>
<b>MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)</b> .....	<b>89</b>
<b>MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)</b> .....	<b>91</b>
<b>Strategic Plan</b> .....	
<b>SP-05 Overview</b> .....	<b>92</b>
<b>SP-10 Geographic Priorities - 91.415, 91.215(a)(1)</b> .....	<b>93</b>
<b>SP-25 Priority Needs - 91.415, 91.215(a)(2)</b> .....	<b>100</b>
<b>SP-30 Influence of Market Conditions - 91.415, 91.215(b)</b> .....	<b>108</b>
<b>SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)</b> .....	<b>109</b>
<b>SP-40 Institutional Delivery Structure - 91.415, 91.215(k)</b> .....	<b>111</b>
<b>SP-45 Goals - 91.415, 91.215(a)(4)</b> .....	<b>116</b>
<b>SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)</b> .....	<b>123</b>
<b>SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)</b> .....	<b>124</b>
<b>SP-60 Homelessness Strategy - 91.415, 91.215(d)</b> .....	<b>126</b>
<b>SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)</b> .....	<b>128</b>
<b>SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)</b> .....	<b>129</b>
<b>SP-80 Monitoring - 91.230</b> .....	<b>130</b>

# 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 2025 through FY 2029 (April 1, 2025 to March 31, 2030).

#### 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, services to support youth, senior, and at-risk populations, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand household economic opportunities and financial stability 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 data tables. Where necessary, HUD-provided tables have been updated or supplemented with more accurate or relevant data.

## **2. Summary of the objectives and outcomes**

The Strategic Plan provides a framework to address the needs of the Town of Amherst for the next five years using CDBG and HOME funds. The overarching goals and objectives guide the proposed priorities and programming activities and include:

- Improve Housing Stock
- Provide Affordable Home Ownership
- Generate New Affordable Housing
- Support Community Service Needs
- Reduce Homelessness Risk
- Affirmatively Further Fair Housing
- Support Neighborhood Revitalization.

Outcomes show how programs and activities benefit a community or the people served. The outcomes that will illustrate the benefits of each activity funded by the CDBG and HOME programs are:

- Total Improved/Rehabilitated Housing Units, Owner-occupied & Rental
- Total New Housing Units Generated
- Total Homebuyers assisted with Direct Financial Assistance
- Total Households assisted with Housing Counseling or Homelessness Prevention
- Total Seniors assisted with Transportation or Meal Services
- Total Households assisted with Fair Housing Advocacy
- Total Households assisted by Community Service Programming
- Total Residents served by Public Facility and Infrastructure Investments

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 Town of Amherst, and the Consortium as a whole, have withstood the shock of COVID-19 and economic aftermath better than most communities with reports of homeless individuals whose last known address was in the ACT Consortium trending down, unemployment rates holding steady, and a lower percentage of cost burden and housing problems than the region. The Towns of Tonawanda and Amherst took advantage of the lack of a public service cap with CDBG-CV funds to aggressively combat homelessness, the Town of Cheektowaga invested heavily in their food pantries and senior services, and each of the consortium towns worked to rehabilitate residential properties and provide supportive services to renters and homeowners in order to maintain existing housing.

The Consortium towns will now need to withstand the negative economic impacts of large-scale events like the closure of the Boulevard Mall in Amherst and the Sumitomo rubber facility in Tonawanda. Amherst is specifically focusing programs in and around the Mall property and throughout the Town to support neighborhood preservation, infrastructure investments, small business, and commercial property owners. The Town is also seeking ways to address rising housing costs and shortages through expanded assistance in the First-time Homebuyer Program and new programming like rehabilitation and construction of Accessory Dwelling Units (ADUs), although the new construction outside of the existing principal structure is not eligible for CDBG or HOME funding.

The Town of Amherst also uses CDBG funds to create a suitable living environment by funding public services that improve the lives of its low-moderate income residents by providing services to seniors, youth and battered spouses, as well as providing special community policing efforts in target neighborhoods.

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

The Town of Amherst's past performance in the administration and implementation of the CDBG and HOME programs has fulfilled the spirit and intent of the federal legislation creating these programs. The Town has facilitated affordability for decent housing, availability and accessibility of suitable living environments, sustainability of suitable living environments, and the accessibility of economic opportunities. The following is a summary of the Town's past performance as reported to HUD in the FY2023 Consolidated Annual Performance and Evaluation Report (CAPER), the most recent report filed.

During the 2023 program year, April 1, 2023 through March 31, 2024, the Town of Amherst provided \$405,282 in housing rehabilitation loans to eligible owners of twenty-three (23) single family homes. This sum includes \$246,779 in CDBG funds, \$127,707 in HOME funds, and \$30,796 in NYS Affordable Housing Corporation's matching grant funds expended during this period. There was one veteran household assisted utilizing CDBG funds in Amherst. Lead paint hazards were remediated in seven (7) homes and fourteen (14) homes were weatherized in Amherst. During PY23, none of the clients in the

first-time homebuyer program have been able to find a house in the Town that they can afford. The housing market has a very low supply of affordable homes making it difficult for clients in the program to find a house. To deal with increased housing values, the Town of Amherst amended its first-time homebuyer program in September of 2023 to not only provide closing cost assistance but to provide up to \$50,000 in down payment and or closing cost assistance. This additional assistance will bridge the gap between the sale price and the mortgage amount, making the home more affordable to low-moderate income first-time homebuyers. The program has a total of \$300,000 to assist 6 homebuyers during the program year of 2024. There are currently six (6) households approved for the program, of which three (3) households are still searching for a home to purchase under the program's value limit, and another nine (9) households are tentatively approved and on the waiting list. If the program is successful, the Town will set aside more HOME funding for future program years.

In Cheektowaga, \$785,091 was spent of HOME funds for ten (10) housing rehabilitation activities. There were two (2) properties that had lead-based paint remediated. In Tonawanda, \$353,167 in HOME funds were spent on housing rehabilitation for seven (7) single-family homes. There were five (5) homes that had lead paint removed.

HOME funds are also used to purchase foreclosed, vacant and deteriorated residences in Amherst for rehabilitation (or demolition/new construction) and eventual resale to an income eligible first-time homebuyer. This activity is accomplished in conjunction with the Town's designated Owner Developer, New Opportunities Community Housing Development Corp. In Program Year 2023, New Opportunities completed their rehab of a vacant property located at 345 Grover Cleveland Highway and HOME funds were made available to assist a first-time homebuyer in purchasing it during the 2023 program year (a total of \$85,093 in assistance was provided). As the appraisal of the home was \$226,000, to make it affordable to a first-time homebuyer the Town provided a purchase subsidy in the amount of \$75,000 through a loan forgiven over 15 years. The Town also provided closing costs of \$10,093.00 to the homebuyer via a lien, which will be due in full when the house is sold.

In 2024, the Towns of Tonawanda and Cheektowaga made the innovative arrangement to increase the share of HOME funding to Tonawanda to support a project that needed an additional boost. The Victoria Place project in the Town of Tonawanda is an affordable multifamily housing project containing 37 units of senior rental housing in the Village of Kenmore for persons 55+ years of age and includes six accessible units for person with mobility and hearing/vision impairments. In exchange for Cheektowaga's HOME funding to leverage the project, Cheektowaga will receive what would have been Tonawanda's HOME funds in 2025. This coordinated participation allows the towns to not only maximize the impact of federal funding within their respective communities, but also to maximize the regional impact.

#### **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. Participation by low- and moderate-income persons, including those living in designated CDBG target areas and residents of predominantly low- and moderate-income neighborhoods (as defined by the Federal guidelines), is particularly encouraged, as is the participation of all residents, including seniors, minorities, and persons with disabilities.

### Citizen Participation Process

Each town also invites residents of public and assisted housing developments to participate in the process of developing and implementing the Consolidated and Annual Plans. The Towns will provide copies of this Citizen Participation Plan upon request. As an office policy, all members of the community are encouraged to comment on the housing and community development needs in their neighborhoods at any time throughout the year by stopping in the Community Development Department's office located in the Amherst Planning Department within Amherst Town Hall 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 U.S. 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. In addition, the Towns will provide a copy of the plan(s) to citizen groups that request it and copies on disk to individuals.

Public hearings in the Town of Amherst are conducted as part of regularly scheduled Town Board meetings and thus have a "captive audience" with a broader reach than would be experienced at separate meetings for the Annual Plan alone. Video recordings of Amherst Town Board meetings are also available online through the Town's website.

The Towns will consider any comments or views of citizens received in writing, or orally at the public hearings, during the preparation of the final Annual and Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons, therefore, shall be attached to the final Annual and Consolidated Plan.

The Town requested citizen comments on the 2025-2029 5-Year ACT Consolidated Plan and the 2025 Annual Action Plan, both written or oral, be submitted by January 27, 2025. Written comments were

required to be submitted to Amherst Community Development, 5583 Main Street, Williamsville, NY 14221.

## **5. Summary of public comments**

Public comments were received orally from Shelly Schratz and Jerri DiCosmo, Amherst citizens, at the first public hearing for the Annual Action Plan held in October 2024. Ms. Schratz asked questions regarding how the Town seeks public comment and how community organizations are solicited for participation, and recommended a program that would assist homeowners with sidewalk improvements. Community Development staff responded by clarifying key points of the Town's Citizen Participation Plan and also mentioned that the Homeowner Rehab Program does provide assistance for sidewalk and driveway repairs currently.

Ms. DiCosmo commented how the live-Town Board meeting coverage on YouTube doesn't allow real-time online public comments to be received and how that function should be enabled for public hearings of this nature. Community Development staff responded by reiterating that the public comment period for requests for funding would be open for another 30-days and to contact staff if someone had ideas for programming funding they'd like to recommend or discuss.

No written comments were received during the hearing or throughout the remainder of the 30-day public comment period in October-November 2024.

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

All comments were accepted.

# 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	
CDBG Administrator	Amherst	Town of Amherst Community Development
HOPWA Administrator		
HOME Administrator	Amherst	Town of Amherst Community Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

### Narrative

The Town of Amherst Community Development Department is the lead agency for the preparation of the Five-Year Consolidated Plan and administration of the CDBG and HOME programs. The Towns of Cheektowaga and Tonawanda serve as Participating Grantees in the ACT HOME Consortium.

### Consolidated Plan Public Contact Information

The Town of Amherst Community Development administers the Amherst HOME Consortium allocation for the three towns of Amherst, Cheektowaga, and Tonawanda. Amherst’s Community Development Department (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:

Laurie Stillwell, Community Development Director  
Town of Amherst Community Development  
5583 Main Street  
Williamsville, NY, 14221  
email: lstillwell@amherst.ny.us  
phone: (716) 631-7050

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

### 1. Introduction

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

The Town of Amherst coordinated its Strategic Plan goals with the goals of numerous local and regional plans. The Town of Amherst coordinates with the Towns of Cheektowaga and Tonawanda in the planning and implementation of the Consolidated Plan. The three towns cooperate on initiatives extensively due to their participation in a HOME Consortium.

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

During the final week of June 2024, the Town of Amherst, and the ACT HOME Consortium, participated in focus groups with a large cross section of stakeholders to discuss the Five-Year Consolidated Plan and funding priorities. The outreach effort further included public meetings, notices, and interviews. Furthermore, the Department implements a range of affordable housing and community development activities, including administration of the CDBG and HOME programs; preparation of the Consolidated Plan, the Consolidated Annual Performance Evaluation Report (CAPER), and the Annual Action Plan; technical assistance for and collaboration with non-profit and for-profit housing developers and social service agencies; housing rehabilitation and other affordable housing policy work.

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

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

Homelessness is less concentrated in the Town of Amherst and the remainder of the ACT Consortium footprint. There are no homeless shelters within the ACT Consortium, and rapid re-housing is difficult due to the suburban nature of the Consortium. Therefore, the response to homelessness can't be measured by the number of available shelter beds, but rather by a holistic approach that attempts to address the systemic issues that lead to homelessness.

The Homeless Alliance of Western New York manages the CoC within the ACT Consortium. The CoC maintains a rapid re-housing program for the five-county Western New York area. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability. During the development of the Town's 5-Year Consolidated Plan, the Homeless Alliance of Western New York was a significant data source for defining the homelessness issues.

The Town contracts with three HUD-certified housing counseling agencies to provide one-on-one counseling with low-moderate income eligible residents with housing issues who are often at risk of homelessness, credit/financial issues, apartment searches, tenant-landlord issues, fair housing issues, etc. Belmont Housing Resources for WNY administers the Sec 8 rental assistance program for all of Erie County (except for City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at the risk of mortgage default or foreclosure. Housing Opportunities Made Equal provides fair housing counseling, addresses tenant-landlord disputes and offers trainings on tenants' rights and landlord responsibilities.

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

The Town of Amherst does not receive ESG funds.

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

*\*See attached Appendix with complete Organizational/Stakeholder Outreach List.*

Agency/Group/ Organization	Agency/Group/Organizati on Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?

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

**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?
Town of Amherst 2020 Capital Improvement Program	Town of Amherst	The Strategic Plan takes into consideration projects identified in the Town’s Capital Improvement Program.
2024 Amherst Annual Action Plan	Town of Amherst	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2023 Town of Amherst Consolidated Annual Performance Evaluation Report	Town of Amherst	Goals of the Strategic Plan relate to previous years’ efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2022 Town of Amherst Urban Renewal Plan	Town of Amherst	The Urban Renewal Plan prioritizes economic revitalization and community enhancements that require infrastructure improvements and facility development in targeted areas supported by the Strategic Plan.
2024-2029 Amherst Capital Improvement Program	Town of Amherst	Activities within the CIP can often be leveraged by or supported by the Strategic Plan infrastructure activities.
Town of Amherst Economic Study (2016)	Town of Amherst	The Strategic Plan advances recommendations to address public facilities in redevelopment projects.
2007 Bicentennial Comprehensive Plan Amended 2017 and 2019	Town of Amherst	Strategic Plan goals and priorities were developed to be consistent with the Town’s economic action plan focused on economy workforce, and placemaking.
2022 Erie County Hazard Mitigation Plan	Erie County	Plan assesses hazard risks for jurisdictions within Erie County and made infrastructure recommendations
2023 Homelessness Summary Brief	Homeless Alliance of Western New York	The Strategic Plan’s homelessness strategy was developed consistent with the data presented within.
Strategic Economic Development Plan – Amherst 2023	Town of Amherst	The Strategic Plan’s economic development strategy is consistent with the SEDP

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Annual report on “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.
2024 Draft Analysis of Impediments to Fair Housing Choice	Erie County	The current goals and strategies to overcome current barriers to fair housing are drawn from this plan
2022 - 2026 Erie County Comprehensive Economic Development Strategy	Erie County Industrial Development Agency	The Strategic Plan’s economic development strategy is designed to align with and complement the CEDS at the local level
NFTA Light Rail Extension Study	Niagara Frontier Transportation Authority	The goals of the Strategic Plan take into consideration the impact of the NFTA light rail extension.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The Town of Amherst and the ACT HOME Consortium continue collaborative efforts and partnerships with state and local government entities to ensure the complete implementation of the Consolidated Plan. Cooperation and coordination with other public entities is important as many of the initiatives that will be implemented, such as homelessness prevention and economic development initiatives, are regional in scope by nature.

**Narrative**

The Town of Amherst and the ACT HOME Consortium continue to strive to include community agencies in the development and planning process for the Consolidated Plan and Action Plan implementation. The Town has on-going efforts to increase coordination and consultation efforts in its planning processes.

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

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

The Town of Amherst, and the ACT HOME Consortium'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 development of the Town of Amherst 2025-2029 Consolidated Plan involved a variety of public outreach activities designed to gather public input and comment regarding implementation of CDBG, HOME and ESG Programs. The citizen participation process informs the public of the purposes of these programs, the funding allocation process, and to be better aware of the needs of low-and moderate-income citizens. It further invites participation in the development of the Consolidated Plan, Annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), and to ensure that the selected projects meet the needs of the Consortium's constituents.

In June 2024 a series of stakeholder meetings were held with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation. More than 250 individual and organizational stakeholders were invited to participate in seven stakeholder meetings involving: Planning and Zoning and Municipal Officials, Public Housing Authorities, Community-based Organizations (CBOs) and Community Housing Development Organizations (CHDOs), Affordable and Special Needs Housing Organizations, Homeless Assistance Providers, Regional Agencies, Health and Human Services Agencies, Lead-Based Paint Agencies, Business Associations, Persons with Disability Advocacy Organizations, Persons with Limited English Proficiency Advocacy Organizations, Fair Housing Organizations, Non-profit Housing Owners, For-profit Housing Owners, Property Managers, Broadband Agencies, Resilience and Emergency Management Agencies, and Real Estate Developers. A summary table of all the meetings held during the citizen participation process is included on the following page. See the Citizen Participation Appendix for all sign-in sheets, meeting summaries, and comment sheets.

The formal public comment period on the Draft 2025-2029 Consolidated Plan extended from December 27, 2024 to January 27, 2025. A public hearing was held on January 21, 2025 at the regularly scheduled Town Board Meeting to accept and review comments on the draft. All hearings were advertised in the Amherst Bee and posted on Amherst's website. Comments received through the citizen participation process were a part of the Needs Assessment and Market Analysis, and ultimately helped shape the outcome of the Plan's Five-Year Goals and Objectives.

In accordance with 24 CFR 91.100(4), the Town of Amherst will notify adjacent units of local government of the non-housing community development needs included in its 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	Regional Agencies and Economic Development	A stakeholder meeting was held on June 25, 2024 at 10:00 am at the Delavan Grider Community Center. Representatives of nine agencies attended.	Infrastructure is aging and in need of updates. Public transportation and internet access are a concern in rural communities. Lack of new starter homes, not profitable enough to build. Need more public/private partnerships.	All comments were accepted.	
2	Stakeholder Meeting	Homelessness and Special Needs Housing	A stakeholder meeting was held on June 25, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 26 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing capacity. Strengthen supportive services. Address regulatory issues that prevent shelters and affordable housing from being built.	All comments were accepted.	
3	Stakeholder Meeting	CHDOs and CBDOs	A stakeholder meeting was held on June 26, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Enhance community engagement. Encourage banks to be more supportive and flexible in their housing loan qualification process. Improve homebuyer training. Explore modular housing to address need for affordable and efficient housing solutions. Assess the financial impact of the 2027 electric mandate.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
4	Stakeholder Meeting	Health and Human Services	A stakeholder meeting was held on June 26, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing in general as well as for DV victims. Address language barriers. Increase services for school age children. Increase funding to nonprofits. Address transportation needs.	All comments were accepted.	
5	Stakeholder Meeting	Housing and Property Owners/Managers	A stakeholder meeting was held on June 27, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Increase shelter capacity. Develop transition programs. Enhance homebuyer education. Address affordable housing. Improve public housing sustainability. Strengthen supportive services. Monitor rental market. Enhance maintenance and security. Focus on needs of rural communities.	All comments were accepted.	
6	Stakeholder Meeting	Advocacy and Fair Housing Organizations	A stakeholder meeting was held on June 27, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Increase education programs on fair housing laws. Increase enforcement of fair housing laws. Address affordable housing.	All comments were accepted.	
7	Stakeholder Meeting	Resilience and Emergency Management	A stakeholder meeting was held on June 28, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of three agencies attended.	Municipal officials throughout the region must continue efforts to train for disaster preparedness. The natural and built infrastructure presents significant flooding risk and infrastructure investments are imperative.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
8	Public Hearing	Non-targeted/broad community	The Town of Amherst held a public hearing on October 15, 2024 to provide information on estimated amount of CDBG and HOME funds available and to obtain views of citizens on housing and community development needs. No one attended this hearing.	Comments included questions on how solicitation for participation in the 5 year Consolidated Plan process and recommendations to include programming to assist homeowners with sidewalk repair. Another comment focused on how real-time online comments should be allowed in coordination with the live You-tube stream of the Town Board Public hearing.	All comments were accepted.	
9	Newspaper Ad	All community residents	Notice of availability of the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan for public review and comment was published in the Amherst Bee on 12/19/24 and on the Town's website.	TBD		
10	Public Hearing	Non-targeted/broad community	The Town of Amherst held a public hearing on January 21, 2025 to review and accept comments on the Draft FY 2024-2025 Consolidated Plan.	TBD	N/A	

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### **Needs Assessment Overview**

The needs assessment is based on an analysis of housing problems in the Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium faced by low-to-moderate income level renters, owners, as well as households with special needs populations. Regional housing needs were also identified through a comprehensive public outreach process that included stakeholder meetings, public hearings, and a review process designed to meaningfully engage citizens.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of American Community Survey (ACS) data compiled by the Census Bureau. CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities; as well as cost burden, which occurs when a household pays more than 30% of its gross household income on housing costs. Extreme cost burden occurs when a household pays more than 50% of its gross household income on housing costs.

Supplemental data were drawn from the 2022 ACS 5-Year Estimates and other sources to provide additional context when needed.

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

### Summary of Housing Needs

The Amherst-Cheektowaga-Tonawanda HOME Consortium is comprised of three towns with total population of 290,733. Amherst is the largest of the three towns, representing 45.1% of the Consortium followed by Cheektowaga, 30.4%, and Tonawanda, 24.5%. As shown in the table below, the percentage distribution for owner and renter occupied housing units are somewhat similar to the population distribution among the towns. In each of the towns, renter occupied units represent 28-30% share of all occupied housing units. In Amherst specifically, 29.5% of all total occupied housing units are rented units.

	Population		Owner Occupied Units		Renter Occupied Units	
	Number	Percent	Number	Percent	Number	Percent
Amherst	131,064	45.1%	36,762	41.3%	15,375	42.3%
Cheektowaga	88,358	30.4%	28,054	31.5%	11,527	31.8%
Tonawanda	71,311	24.5%	24,263	27.2%	9,407	25.9%
Total	290,733	100.0%	89,079	100.0%	36,309	100.0%

**Table 5– Population and Owner/Renter Units**

*Source: 2022 ACS 5-Year Estimates*

In the following Housing Needs Assessment section and throughout the Consolidated Plan there will be various data presentations of housing needs of low-to-moderate income (LMI) renter households and LMI homeowner households. LMI households are those households who have a total household income that is at or below 80% of the Area Median Income (AMI). The U.S. Department of Housing and Urban Development (HUD) develops HUD Area Median Family Income (HAMFI) thresholds annually according to household size with values applicable to a given Metropolitan Statistical Area or MSA. For Amherst, Cheektowaga and Tonawanda’s AMI/HAMFI thresholds are based on the regional Buffalo-Niagara MSA Area Median Income levels.

## Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	14,370	13,855	20,020	12,640	62,085
Small Family Households	2,965	3,385	5,000	3,910	31,990
Large Family Households	294	480	1,009	580	3,385
Household contains at least one person 62-74 years of age	3,125	2,945	4,925	3,080	14,439
Household contains at least one person age 75 or older	3,050	4,530	4,605	2,250	5,480
Households with one or more children 6 years old or younger	1,398	1,348	2,009	1,087	3,254

**Table 6 - Total Households Table**  
2016-2020 CHAS

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

The number of LMI renter occupied households and the number of LMI owner-occupied housing within the Consortium is almost the same, at 23,194 renter households and 25,040 owner households. However, when expressed as a percentage of households as a whole, the predominance of LMI individuals within renter households becomes apparent. Statistically renter households have significantly lower income than owner-occupied households. Low-to-moderate income renter households represent 63.9% of all renter households (36,309 total), while only 28.1% of all owner-occupied households (89,079 total) have an income that is at or below 80% of Area Median Income.

The total number of housing units in the Consortium has increased modestly – approximately 5% more renter occupied units and approximately 1% more owner occupied units - while the percentage of LMI residents has remained fairly stable.

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

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

Renter-occupied units under 80% of the AMI and experiencing cost burden totaled 15,743, or 43% of all renter-occupied units. Owner-occupied units under 80% of the AMI and experiencing cost burden total 10,851 households, or 12% of all owner-occupied units. The proportional impact on renters was dramatically higher than for owners.

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

Renter units occupied by elderly under 80% of the AMI and experiencing cost burden totaled 5,041, or 32% of all renter-occupied units experiencing cost burden. Owner-occupied units in the same subcategory totaled 6,141, or 57% of all owner-occupied units experiencing cost burden. The majority of homeowners in the Consortium communities who are cost-burdened are elderly, a reflection of the housing vulnerability of individuals aging-in-place within the Consortium communities.

Housing Problems

Housing problems according to HUD are analyzed by renter and owner-occupied households on the basis of physical/condition issues and affordability. Categories of these housing problems include: (1) Substandard Housing - Lacking complete plumbing or kitchen facilities, (2) Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing), (3) Overcrowded - With 1.01-1.5 people per room, (4) Housing cost burden greater than 50% of income, and (5) Housing cost burden greater than 30% of income.

Relatively few units within the Consortium were classified as substandard for overcrowding. As reflected in the tables below, 715 LMI households, mostly renters, were reported as having a lack of complete plumbing or kitchen facilities (down 30% since the last Consolidated Plan prepared in 2019), and a total of 936 households, a majority of which are also renters, were reported as experiencing overcrowding, which is a significant increase (88.5%) from five years ago.

**Housing Needs Summary Tables**

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	125	235	110	145	615	40	20	30	10	100

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	14	40	50	10	114	130	20	59	4	213
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	100	100	115	70	385	15	95	79	35	224
Housing cost burden greater than 50% of income (and none of the above problems)	6,160	1,775	520	55	8,510	2,935	1,370	609	144	5,058
Housing cost burden greater than 30% of income (and none of the above problems)	879	3,120	2,635	435	7,069	995	2,244	2,570	1,080	6,889
Zero/negative Income (and none of the above problems)	810	0	0	0	810	595	0	0	0	595

**Table 7 – Housing Problems Table**  
2016 – 2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	6,405	2,150	790	285	9,630	3,115	1,510	790	200	5,615
Having none of four housing problems	2,744	4,195	6,910	3,380	17,229	2,105	5,995	11,525	8,770	28,395
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 - Housing Problems one or more severe including cost burden >50%**  
2016-2020 CHAS

Since only a very small percentage of households have substandard conditions or overcrowding, it can be assumed that “severe housing cost burden”, which are situations where housing costs are in excess of 50% of household income, is the predominate housing problem facing households identified as “having one or more of four housing problems”.

Severe housing cost burden is also the predominate housing problem facing renter-occupied households identified as “having one or more of four housing problems”. In renter-occupied households, 70% of households with an income under 30% of AMI and 34% of households with an income between 30-50% of AMI reported having one or more of four housing problems, which most likely included housing costs greater than 50% of household income. Approximately 23% of all renter-occupied units are experiencing severe cost burden.

In owner-occupied units, 56% of households with an income under 30% of AMI and 18% of households with an income between 30 and 50% of AMI reported having one or more of four housing problems, which most likely included housing costs greater than 50% of household income. Approximately 6% of all owner-occupied units are experiencing severe cost burden.

3. Cost Burden > 30%

	Renter-occupied Housing				Owner-occupied Housing			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,920	1,740	875	4,535	659	794	825	2,278
Large Related	100	175	80	355	104	155	144	403
Elderly	2,103	1,569	1,369	5,041	2,494	2,195	1,452	6,141
Other	3,090	1,743	979	5,812	749	485	795	2,029
Total need by income	7,213	5,227	3,303	15,743	4,006	3,629	3,216	10,851

**Table 9 – Cost Burden > 30%**  
2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	505	505	594	275	0	869
Large Related	0	0	0	0	104	65	35	204
Elderly	1,629	724	445	2,798	1,685	770	279	2,734
Other	0	2,900	688	3,588	630	0	0	630
Total need by income	1,629	3,624	1,638	6,891	3,013	1,110	314	4,437

**Table10 – Cost Burden > 50%**  
2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	114	115	110	70	409	145	90	118	39	392
Multiple, unrelated family households	0	25	10	0	35	0	25	20	0	45
Other, non-family households	0	0	65	50	115	0	0	0	0	0

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Total need by income	114	140	185	120	559	145	115	138	39	437

**Table 11 – Crowding Information**  
2016-2020 CHAS

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

The 43,451 households within the Consortium who are living alone represent slightly over one-third of all the households within the ACT Consortium. A review of the data for each of the three towns shows very little variation from the proportions and percentages shown in Table 10 below. Forty-six percent of all single person households living alone are age 65 and over.

Households living alone	Total		Male		Female	
Non-elderly	23,271	53.45%	11,539	44.93%	11,732	65.69%
Age 65 and over	20,270	46.55%	14,141	55.07%	6,129	34.31%
Total living alone	43,541	100.00%	25,680	100.00%	17,861	100.00%

**Table 12 – Households Living Alone – ACT Consortium**  
2022 ACS Five Year Estimates

**Estimate the number and type of families in need of housing assistance who are disabled**

Based on the 2020 Census data, there were 13,069 persons living with a disability in Amherst, comprising 10.2% of the total noninstitutionalized population. Of this population, 50.0% were 65 years and older. The most common disability status was ambulatory difficulty (i.e. physical challenges), which was experienced by 43.5% of the disabled population. Forty-three percent, or 5,641 persons, expressed an independent living difficulty, which is defined as characterized as a physical, mental, or emotional challenge that prevents someone from performing everyday errands alone.

Total civilian noninstitutionalized population with a disability	13,069	10.2%
<b>By Age Group:</b>		
Under 5 Years of Age	0	0.0%
Age 5 to 17 Years	840	1.7%
Age 18 to 34 Years	1,707	3.5%
Age 35 to 64 Years	3,981	8.1%
Age 65 to 74 Years	2,034	4.1%
Age 75 Years and Over	4,507	9.2%
<b>Type of Disability (All ages)</b>		
With a hearing difficulty	3,582	27.4%
With a vision difficulty	1,834	14.0%
With a cognitive difficulty	5,049	38.6%
With an ambulatory difficulty	5,691	43.5%
With a self-care difficulty	2,491	19.1%
With an independent living difficulty	5,641	43.2%

**Table 13 - 2020 Population with a Disability by Age and Type in the Town of Amherst**

*Source: 2020 Decennial Census*

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

The most common housing problem experienced by renter households is cost burden in excess of 30% of household income. For low-to-moderate income renter households in the ACT Consortium, 15,743 were considered cost burdened, including 5,041 who were elderly. For homeowners, 10,851 low-to-moderate income households were considered cost burdened with housing costs in excess of 30% of household income, including 6,141 elderly households.

Aside from cost burden an additional 313 owner-occupied households and 729 renter households are experiencing at least one type of housing problem, including overcrowding, lack of kitchen facilities and/or lack of bathroom facilities. Lack of complete kitchen or plumbing facilities is the most common physical housing problem for renters. Across household income categories, physical housing problems are most common among households in the 0%-30% and 30%-50% of HAMFI category. Overcrowding, with 1.01-1.5 people per room, is the most common for LMI homeowners. For context, a household with more than 1.5 people per room is considered severely overcrowded.

In sum, many of the ACT Consortium’s low-income owner and renter households have housing problems and the Consortium towns address these housing needs through their various residential rehabilitation programs and through the creation of new affordable units.

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

On both a percentage and a numerical basis, “other” renter households account for the most cost burdened and severely cost burdened households. Among owner households, the elderly are the most

cost burdened and severely cost burdened. There are 5,812 “other” renter households paying more than 30% of income housing costs, accounting for 36.9% of all cost-burdened households. There are 3,588 “other” households paying more than 50%, representing 52.1% of severely cost-burdened households.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

The lack of affordable housing makes it difficult for low-income individuals and families with children to maintain a stable household. No data exists that would specifically enumerate or describe the at-risk or formerly homeless population or rapid-rehousing recipients nearing termination within the Consortium’s jurisdiction. Stakeholder groups were specifically concerned about low income individuals and families with children facing termination of housing assistance and their ability to find affordable housing options, as the housing market has tightened significantly and rents have dramatically increased since the COVID-19 pandemic. The demand for affordable and transitional housing units continues to increase due to this ever-growing market pressure and lack of affordable housing stock.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

No estimate of at-risk populations is available.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

The Homeless Alliance for Western New York (HAWNY) continues to cite the distance between low-cost housing and employment opportunities, transportation, and a lack of affordable housing as keys to homelessness. According to HAWNY’s 2023 Summary Brief, Erie County has slightly bucked the regional and national trend by seeing a slight reduction in homelessness since New York State’s COVID-era eviction moratorium was lifted and experienced a 2.6% decrease in people experiencing homelessness, a 9% reduction in chronic homelessness, and a 10% decrease in youth homelessness. That said, HAWNY cites housing insecurity and poverty as higher than usual risk factors that contribute to homelessness.

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

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

### Introduction

The tables below indicate, by income level and race or ethnicity, the number of households experiencing one or more of the following four housing problems: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%. Based on American Community Survey (ACS) population estimates for 2022, each of the Consortium communities is predominately white (ranging from 78.5% for the Town of Amherst, to 78.6% for the Town of Cheektowaga, and 85.2% for the Town of Tonawanda), which explains the higher number of white households at all income levels experiencing one or more housing problems. The subsequent tables reflect, by percentage, the number of households within certain incomes and racial and ethnic groups, which experience one or more housing problems as compared to the population as a whole, indicating where a disproportionately greater need exists.

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

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	10,670	1,515
White	7,890	1,245
Black / African American	1,235	150
Asian	807	55
American Indian, Alaska Native	95	0
Pacific Islander	0	4
Hispanic	450	35

**Table 14 - Disproportionally Greater Need 0 - 30% AMI**  
2016 – 2020 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	8,920	4,294
White	7,280	3,924
Black / African American	835	180
Asian	319	14
American Indian, Alaska Native	30	0
Pacific Islander	0	0
Hispanic	355	130

**Table 15 - Disproportionally Greater Need 30 - 50% AMI**  
2016 – 2020 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	6,980	12,019
White	5,780	10,605
Black / African American	695	800
Asian	285	259
American Indian, Alaska Native	0	40
Pacific Islander	4	4
Hispanic	129	239

**Table 16 - Disproportionally Greater Need 50 - 80% AMI**  
2016 – 2020 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	1,785	11,150
White	1,610	9,860
Black / African American	70	794

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Asian	55	200
American Indian, Alaska Native	0	19
Pacific Islander	0	0
Hispanic	45	220

**Table 17 - Disproportionally Greater Need 80 - 100% AMI**  
2016 – 2020 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### Discussion

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

Racial/Ethnic Group	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
White	86.4%	65.0%	35.3%	14.0%
Black African/American	89.2%	82.3%	46.5%	8.1%
Asian	93.6%	95.8%	52.4%	21.6%
American Indian/ Alaska Native	100.0%	100.0%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	50.0%	0.0%
Hispanic	92.8%	73.2%	35.1%	17.0%
Jurisdiction as a Whole	87.6%	67.5%	36.7%	13.8%
*Cost Burden over 30%				

**Table 18 -% Households With One Or More Housing Problems**  
Source: CHAS 2016-2020

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

- Black African American households earning 30-50% AMI
- Asian households earning 30-50% AMI and 50-80% AMI
- American Indian/Alaska Native households earning 0-30% AMI and 30-50% AMI
- Pacific Islander households earning 50-80%

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

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

### Introduction

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

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

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,975	3,195	1,445
White	6,505	2,620	900
Black / African American	1,025	359	115
Asian	782	80	304
American Indian, Alaska Native	95	0	0
Pacific Islander	0	4	0
Hispanic	390	100	95

**Table 19 – Severe Housing Problems 0 - 30% AMI**  
2016 – 2020 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,990	9,230	0
White	3,280	7,940	0
Black / African American	345	680	0
Asian	213	120	0
American Indian, Alaska Native	10	20	0
Pacific Islander	0	0	0
Hispanic	115	375	0

**Table 20 – Severe Housing Problems 30 - 50% AMI**  
2016 – 2020 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,655	17,335	0
White	1,359	15,010	0
Black / African American	154	1,350	0
Asian	70	475	0
American Indian, Alaska Native	0	40	0
Pacific Islander	0	8	0
Hispanic	70	309	0

**Table 21 – Severe Housing Problems 50 - 80% AMI**  
2016 – 2020 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	310	12,625	0
White	305	11,165	0
Black / African American	0	864	0
Asian	0	255	0
American Indian, Alaska Native	0	19	0
Pacific Islander	0	0	0
Hispanic	4	255	0

**Table 22 – Severe Housing Problems 80 - 100% AMI**  
2016 – 2020 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

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

Racial/Ethnic Group	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
White	71.3%	29.2%	8.3%	2.7%
Black African/American	74.1%	33.7%	10.2%	0.0%
Asian	90.7%	64.0%	12.8%	0.0%
American Indian/ Alaska Native	100.0%	33.3%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	79.6%	23.5%	18.5%	0.0%
Jurisdiction as a Whole	73.7%	30.2%	8.7%	2.4%

**Table 23 - % with one or more severe housing problems, cost burden over 50%**  
2016 – 2020 CHAS

In general, the percentage of households with a severe housing problem is highest for the lowest income bracket (0-30% AMI) and decreases as income increases. According to the above definitions, the

racial/ethnic groups in the Consortium that were disproportionately impacted as having one or more severe housing problems were:

- Asian households earning 0-30% AMI and 30-50% AMI
- American Indian/Alaska Native households earning 0-30% AMI
- Hispanic households earning 50-80% AMI.

It is important to note that the percentages of housing problems and severe housing problems are down significantly across the Consortium as a whole based on a comparison to the 2011-2015 CHAS data, however the trend has not benefited all ethnic and racial groups equally. However, the Asian and American Indian/Alaska Native populations are not seeing the same positive trend as the rest of the Town.

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

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

### Introduction

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

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	90,794	15,740	14,055	1,545
White	81,125	12,975	10,760	965
Black / African American	4,360	1,510	1,480	135
Asian	2,648	524	958	329
American Indian, Alaska Native	90	20	120	0
Pacific Islander	12	14	0	0
Hispanic	1,679	545	540	95

**Table 24 – Greater Need: Housing Cost Burdens AMI**  
2016-2020 CHAS

### Discussion

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

- Pacific Islanders paying 30-50% of household income.
- Asian households paying more than 50% of income for housing.
- American Indian/Alaska Native households paying more than 50% of income for housing.

While these are generally small sample sizes, the cost burden for Pacific Islanders and severe cost burden for American Indian/Alaska Natives are very high.

<b>Racial/Ethnic Group</b>	<b>Less than 30% (No cost burden)</b>	<b>Cost Burden 30-50%</b>	<b>Severe Cost Burden 50% or more</b>	<b>No negative income (not computed)</b>
White	76.7%	12.3%	10.2%	0.8%
Black/African American	58.2%	20.2%	19.8%	1.8%
Asian	59.4%	11.8%	21.5%	7.3%
Amer Indian/Alaska Native	39.1%	8.7%	52.2%	0.0%
Pacific Islander	46.2%	53.8%	0.0%	0.0%
Hispanic	58.7%	19.1%	18.9%	3.3%
Jurisdiction as a Whole	74.3%	12.9%	11.5%	1.3%

**Table 25 – % Households Experiencing Cost Burden**

*Source: CHAS 2016-2020*

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

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

The impact of housing problems within the Consortium varies primarily by income. As shown on the previous tables on disproportionality the following groups within an income tier and race/ethnicity category experienced problems at a rate which was at least 10 percentage points higher than the Town as a whole. Asian households and American Indian/Alaska Native are two racial groups that show a disproportionately greater need than the population at-large for at least one income level in each category. The American Indian/Alaskan Native population is quite small so the percentages do not represent large aggregate numbers, but it is certainly a situation to monitor.

#### Housing Need:

- Black African American households earning 50-80% AMI
- Asian households earning 30-50% AMI and 50-80% AMI
- American Indian/Alaska Native households earning 30-50% AMI
- Pacific Islander households earning 50-80% AMI

#### Severe Housing Need:

- Asian households earning 0-30% AMI and 30-50% AMI;
- American Indian/Alaska Native households earning 0-30% AMI and 30%-50%; and
- Hispanic households earning 50-80% AMI.

#### Cost Burden:

- Pacific Islanders paying 30- 50% of household income
- Asians households paying more than 50% of income for housing
- American Indian/Alaska Native households paying more than 50% of income for housing

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

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

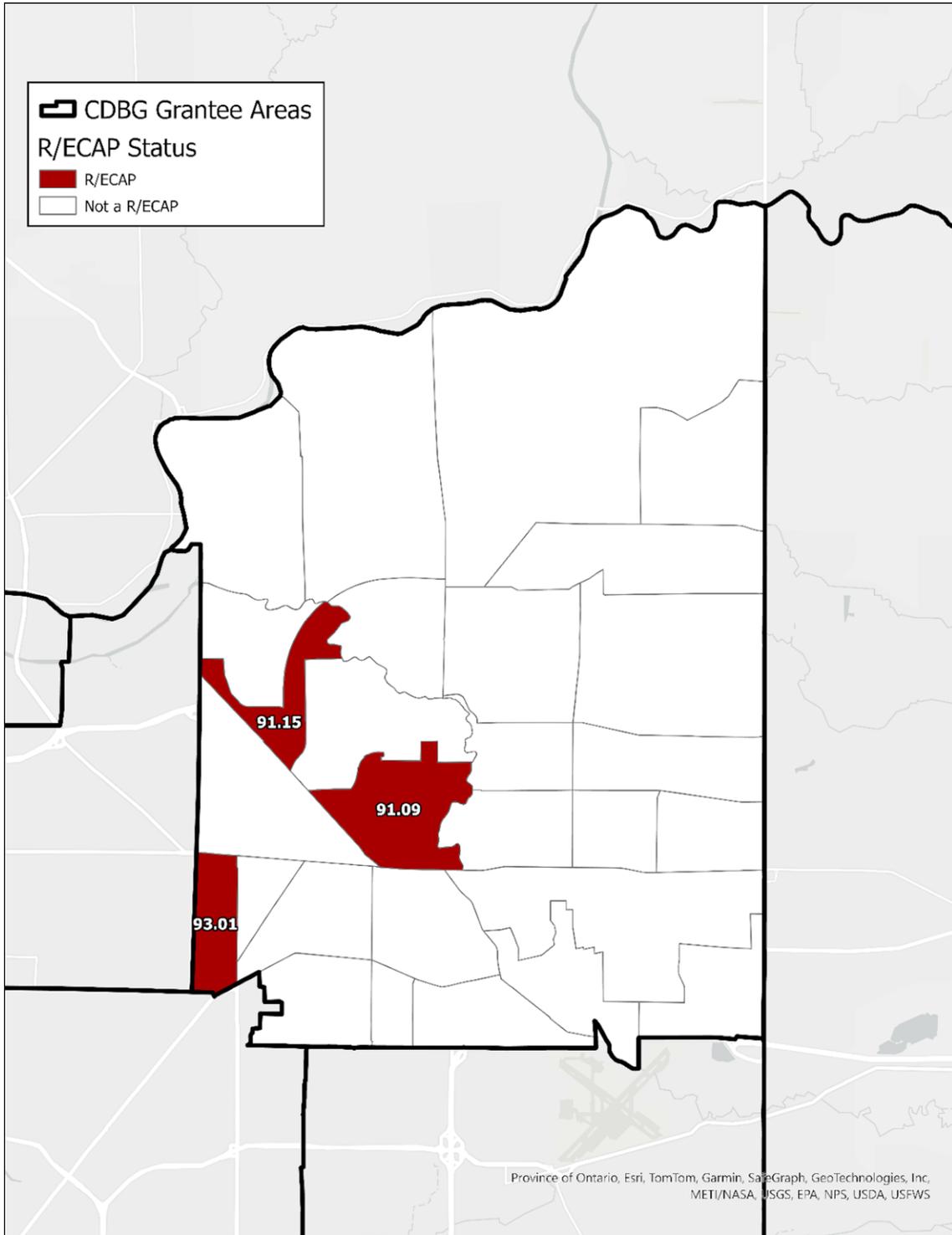
**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The R/ECAPs within Amherst are broken out in the corresponding table and map, where each entry in the column “Tract ID” in Table 26 has a corresponding entry on the map. Three R/ECAPs were identified in Amherst: two surrounding the State University of New York at Buffalo (SUNY Buffalo) campus in the west-central area of the Town, and one in the southwest area of Amherst bordering the Town of Tonawanda. The data for Census Tracts 91.09 and 91.15 require some context as the University of Buffalo has a high enrollment of Chinese and Indian students and college students will often report as a high percentage of poverty. This is unlikely to be reflected of public policy pushing impoverished minorities into a segregated area.

Tract ID	Population	% Black	% Asian	% Hispanic or Latinx	% All Persons of Color, Combined	Poverty Rate	>50% of Households are LMI?*
91.09	3,167	4.5%	21.2%	2.7%	31.8%	21.7%	No
91.15	3,811	3.0%	29.6%	8.4%	41.6%	37.1%	Yes
93.01	4,824	15.4%	11.1%	6.3%	39.0%	18.4%	Yes

**Table 26- Inventory of R/ECAPs in Amherst**  
*2024 Analysis of Impediments to Fair Housing Choice*

Perhaps the most important point is that, by combining all persons of color into a single group and using the size of that group to detect R/ECAPs – as had been the precedent in the five non-Buffalo entitlement communities for multiple previous AI cycles – analysts miss the relative concentration of certain non-white subpopulations, especially Asian Americans, into just a handful of spaces in Amherst. That is, whereas the combined population share of persons of color does *not* reach the critical R/ECA threshold for Amherst, Asian Americans’ shares of population in two of the three R/ECAP tracts listed are well over double the group’s share of Amherst’s overall population (9.6%); and Black or African American and Hispanic or Latinx residents’ shares of population are more than double their Townwide shares (5.5% and 4.5%, respectively) in the third R/ECAP tract. Crucially, all three tracts also have poverty rates that are more than double Amherst’s overall poverty rate (9.2%), meaning that they are concentrated areas of poverty (CAPs) per the adopted definition of this term. For these reasons, the tracts listed above are clearly *racially or ethnically concentrated areas of poverty* in Amherst and should be focal sites of actions aimed at affirmatively furthering fair housing. Thus, moving forward, Amherst and the remaining non-Buffalo entitlement communities should continue to identify R/ECAPs using disaggregated population data so that situations like the one implicated in Table 26 do not continue to mask instances of racially concentrated poverty in their jurisdictional boundaries.



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

### Introduction

The Towns of Amherst, Cheektowaga, and Tonawanda do not have any public housing developments. However, the Kenmore Housing Authority (KHA) has two developments within the boundaries of the ACT Consortium. Kenmore Village Apartments and Theater Apartments each offer 97 one-bedroom units for the elderly. There are 10 accessible units in each building. KHA’s buildings are normally at full occupancy.

According to the following HUD-provided tables, Kenmore’s clientele is extremely low income. Though 29 households were classified as “disabled,” 194 requested accessibility features in their units. Only 10 KHA residents’ households were non-White. Additionally, the 2019 Impediments to Fair Housing document states that residents have an average annual income of \$15,052 and that the length of stay is predominantly 5-10 years (29%) and 10-20 Years (27%).

### Totals in Use

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

**Table 27 - Public Housing by Program Type**

*\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition PIC (PIH Information Center)*

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	15,052	0	0	0	0	0
Average length of stay	0	0	5	0	0	0	0	0
Average Household size	0	0	1	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	165	0	0	0	0	0
# of Disabled Families	0	0	29	0	0	0	0	0
# of Families requesting accessibility features	0	0	194	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 285 – Characteristics of Public Housing Residents by Program Type**  
*PIC (PIH Information Center)*

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	184	0	0	0	0	0	0
Black/African American	0	0	7	0	0	0	0	0	0
Asian	0	0	1	0	0	0	0	0	0
American Indian/Alaska Native	0	0	2	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

**Table 29 – Race of Public Housing Residents by Program Type**

*\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition  
PIC (PIH Information Center)*

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	2	0	0	0	0	0	0
Not Hispanic	0	0	192	0	0	0	0	0	0

**Table 30 – Ethnicity of Public Housing Residents by Program Type**

*\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition  
PIC (PIH Information Center)*

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

### Introduction:

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

Additionally, HUD requires that every CoC conduct an annual Point in Time (PIT) count of the sheltered and unsheltered homeless in the CoC geographic area during the last ten days of January. Counts are further broken down into subpopulation categories including counts of persons who are chronically homeless, persons with severe mental illness, chronic substance abusers, Veterans, persons with HIV/AIDS, and victims of domestic violence. In Erie County, the January 2024 count located 909 households containing 1109 persons predominantly located in emergency shelter and transitional housing. These numbers represent a staggering post-pandemic jump from the 2019 numbers, with an 87% increase in the number of households and a 70% increase in the number of individuals experiencing homelessness.

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

**Table 31– Households and Persons Homeless**

*Source: Homeless Alliance of Western New York – Point in Time Count 2024– 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 2023 homeless population data for the ACT Consortium towns covers homeless clients who were identified as having lived in the zip codes immediately before becoming homeless as indicated for each town. Within the Consortium the trends are far better than they are in Erie County and HAWNY’s five-county region.

Town of Amherst							
Zip Codes	14051	14068	14221	14226	14228	Total	
Count	2	2	19	23	20	66	
Town of Cheektowaga							
Zip Codes	14206*	14211*	14215*	14225	14227	14043	Total
Count	141	373	514	59	19	28	1,134
Note: Zip codes 14206, 14211 and 14215 are shared with the City of Buffalo which likely accounts for more of the homelessness in those zip codes than the Town. For those zip codes unique to Cheektowaga, a total of 106 individuals were reported as experiencing homelessness.							
Town of Tonawanda							
Zip Codes	14150	14217	14207*	14223	Total		
Count	64	28	125	24	241		
Note: Zip code 14207 is shared with the City of Buffalo and 14150 is shared with the City of Tonawanda. Buffalo and the COT likely account for more of the homelessness in those zip codes than the Town. For those zip codes unique to Tonawanda, a total of 116 individuals were reported as experiencing homelessness.							

**Table 32– 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, beyond the zip code data, which is imperfect and does not address the number of days that a person typically remains homeless in these communities. The following information is for the entire five Counties that make up the Continuum of Care:

- According to the 2024 Point-in-Time Count (PIT), there were 67 chronically homeless individuals, none of which were children and three of which were veterans.
- There were 9 unaccompanied youth according to the PIT, all of whom were sheltered (8 in emergency shelters).

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, 231 adults had a serious mental illness, 107 adults had a substance use disorder, 10 adults had HIV/AIDS, and 143 adults were survivors of domestic violence.

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

**Table 33– Additional Homeless Populations**

*Source: Homeless Alliance of Western New York – Point in Time Count 2024– 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 2024 Erie County PIT Count identified 306 individuals in 91 homeless families with children. Of the individuals in families with children, 177 were under 18, 25 were between the ages of 18 and 24, and 104 were over the age of 24. These numbers are fairly stable in relation to homeless children, with the bulk of the increase being in adults over the age of 25. No families with children were unsheltered. Nine children-only households were counted within emergency shelters and transitional housing. No data was available regarding families of veterans within Erie County.

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

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

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

According to the 2024 Point-in-Time Count, there were 1,109 sheltered homeless individuals (893 households) and 16 unsheltered homeless individuals (16 households) in Erie County. Of the sheltered homeless reported, 846 individuals (708 households) were counted in emergency shelters and 263 individuals (185 households) resided in transitional housing facilities. Households living in emergency

shelters included 641 without children, 59 households with at least one adult and one child, and eight households with only children. Households living in transitional housing included 152 households without children, 32 households with at least one adult and one child, and one household with only children.

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 Amherst is presented below:

<b>Town</b>	<b>Zip</b>	<b>Count</b>
Town of Amherst (East Amherst)	14051	2
Town of Amherst (Getzville)	14068	2
Town of Amherst and Village Williamsville	14221	19
Town of Amherst (inc. CT 92 and Eggertsville)	14226	23
Town of Amherst (inc. Creekwood)	14228	20
<b>Total</b>		<b>66</b>

**Table 34– Amherst Homeless Populations**  
*Source: Homeless Alliance of Western New York, 2023*

As the data shows, there are 66 homeless persons being served in the five zip codes that are within the Town of Amherst; a 10% decrease in homeless persons over five years, which runs against the regional trend.

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

### Introduction

In the ACT HOME Consortium, persons who are not homeless but require supportive housing include: elderly; frail elderly; persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence. With potential overlap between each of these populations as well as between special populations and the homeless populations, it is essential to address the characteristics and needs of these populations.

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

#### Elderly

Comprising an estimated 20.9% of the total population, addressing the needs of those ages 65 and over is a critical consideration in developing a suitable living environment within the communities of the Consortium. In addition, Census data from the American Community Survey (ACS) shows the Consortium is aging, with an increase of 14.7% in the population ages 65-74, 16.5% in the population ages 75-84, and 3.7% in the population ages 85 and over between 2017 and 2022. Therefore, the communities are likely to face growing needs such as accessibility, affordable housing and healthcare as more community members reach this senior status.

	2017		2022		% Change
	#	%	#	%	
Total Population	125,024		129,577		3.6%
60 to 64 years	7,823	6.3%	7,232	5.6%	-7.6%
65 to 74 years	12,548	10.0%	14,394	11.1%	14.7%
75 to 84 years	6,729	5.4%	7,839	6.0%	16.5%
85 years and over	4,787	3.8%	4,962	3.8%	3.7%

**Table 35 - Elderly Population in the Town of Amherst**

*Sources: 2017, 2022 ACS Five-Year Estimates*

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

	Population 65 and Over	Total Population
Occupied Housing Units	17,665	52,137
% of Owner-occupied Housing Units	74.3%	70.5%
% of Renter-occupied Housing Units	25.7%	29.5%
% of Householders Living Alone	50.8%	33.0%
Disability Status – With any disability	25.0%	10.2%

**Table 36 - Social Characteristics of the Elderly Population in the Erie County HOME Consortium**  
2022 ACS Five-Year Estimates

Economic data for the elderly population shows that, although there is a smaller percentage of the 65 and older population living below the 100% poverty level than the total population, there is a higher percent of the population living on the brink of poverty, within 100-to-149% of poverty level. According to the 2022 ACS data on elderly economic characteristics (Table 37 below), income sources in the past 12 months for the 65 and older population in Amherst included social security for 90.6% of the population; retirement savings for 69.4% of the population; and current employment earnings for 39.7% of the population. Data for Erie County, as a whole, shows that the mean of all earnings at \$51,885 is substantially larger than that of the mean of social security income at \$21,550, or the mean of retirement savings income at \$26,414. Based on this poverty level data and income sources data, there is a need for affordability considerations for the elderly population.

	Population 65 and Over	Total Population	Mean Earnings or Income for the Pop 65 and Over	Mean Earnings or Income for the Total Pop
% Below 100 percent of the Poverty Level	5.8%	9.2%		
% 100 to 149 percent of the Poverty Level	5.8%	5.1%		
% At or above 150 percent of the Poverty Level	88.4%	85.7%		
Households – With earnings (outside of income listed elsewhere in this table)	39.7%	75.0%	\$84,349	\$119,493
Households – With Social Security Income	90.6%	36.4%	\$25,891	\$24,608
Households – With Supplemental Security Income	3.6%	2.8%	\$12,352	\$12,004
Households – With Cash Public Assistance Income	0.9%	1.3%	\$4,247	\$4,189
Households – With Retirement Income	69.4%	30.1%	\$33,972	\$33,858
Households – With Food Stamp/SNAP benefits	6.5%	7.0%		

**Table 37 - 2022 Economic Characteristics of the Elderly Population in the Town of Amherst**  
2022 ACS Five-Year Estimates

In 2020 there were 13,069 people living with a disability in the Town of Amherst, comprising 10.2% of the total civilian noninstitutionalized population. Of this population, 50.0% were 65 years and older. The most common disability status was an ambulatory difficulty, which is identified through ACS surveys when an individual indicates they have difficulty walking or climbing stairs.

Total civilian noninstitutionalized population with a disability	13,069	10.2%
<b>By Age Group:</b>		
Under 5 Years of Age	0	0.0%
Age 5 to 17 Years	840	1.7%
Age 18 to 34 Years	1,707	3.5%
Age 35 to 64 Years	3,981	8.1%
Age 65 to 74 Years	2,034	4.1%
Age 75 Years and Over	4,507	9.2%
<b>Type of Disability (All ages)</b>		
With a hearing difficulty	3,582	27.4%
With a vision difficulty	1,834	14.0%
With a cognitive difficulty	5,049	38.6%
With an ambulatory difficulty	5,691	43.5%
With a self-care difficulty	2,491	19.1%
With an independent living difficulty	5,641	43.2%

**Table 38 - 2020 Population with a Disability by Age and Type in the Town of Amherst**  
*Source: 2020 Decennial Census*

Economic characteristics of the population with a disability include a larger percentage of the population that is either below 100% of poverty level or between 101 to 125% of poverty level than that of the population with no disability.

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

**Table 39 - 2022 Erie County HOME Consortium Poverty Status in the Past 12 Months**  
*Source: 2022 ACS Five-Year Estimates*

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

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

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

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

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

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

## 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). Most of these facilities have to be in or primarily serve an LMI areas within Town.

The Town of Amherst has a public facility need to invest in recreation, wellness, and alternative transportation accommodations in LMI areas by (i) investing in playgrounds and parks - for example Creekwood Park, Northwest Amherst Community Center, and Eggertsville Community Park; and (ii) continuing to invest in Town trails - for example the Town bike path in Walton Woods; trails and ADA improvements along Ellicott Creek, and trail connections within the Willowridge neighborhood.

The Town of Amherst has identified the need to invest significantly in the Senior Center as a high priority as well. Demands for the Center's facility space and service offerings are ever-growing. The center needs both capital investment in the facility and investment in new equipment that directly support programming capacity. Specifically the Senior Center kitchen requires significant investment, which serves meals for seniors through both the Congregate Dining Program and the Meals on Wheels program. Since the COVID-19 Pandemic the Meals on Wheels program has seen a significant increase in demand which has been trending higher year after year as food costs remain high from inflation.

Other public facility needs have been identified as part of the Town's priorities to reinvest in and recreate a new mixed-use neighborhood through the redevelopment of the Boulevard Mall, specifically a new community center, senior and childcare facilities, public greenspaces, and playgrounds and other recreation amenities to serve the residents of the housing to be built on the site as well as the existing adjacent LMI neighborhoods.

The Section House and the Meeting House in the Village of Williamsville are historic assets that continue to need public support and investment in order to address their blighted condition and historic restoration.

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

The Consortium facilitated a series of stakeholder interviews requesting feedback on needs across the community and the Town of Amherst circulated a Community Development Needs Survey to Department Heads and regional private and not-for-profit service agencies, whereby they identified and prioritized community needs related to public facilities, public services and infrastructure, planning, and housing.

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

Public infrastructure improvements benefit community reinvestment and revitalization, especially low- and moderate-income areas. Amherst's CDBG public improvements will focus on public infrastructure to address critical needs such as upgrading roads, water and sewer systems, sidewalks, and public amenities with beautification of streetscapes, ensuring such infrastructure is safe, accessible, and efficient. These investments in LMI areas not only improve quality of life but also promote economic growth, enhance public safety, and foster sustainable community development. Particular need for these public improvements exist within Amherst's identified Target Areas: Eggertsville, Creekwoods-Willowridge, and the Boulevard Central District/Opportunity Zone.

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

The Consortium facilitated a series of stakeholder interviews requesting feedback on needs across the community and the Town of Amherst circulated a Community Development Needs Survey to Department Heads and stakeholder organizations whereby they identified and prioritized community needs related to public facilities, public services and infrastructure, planning, and housing.

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

In this tight and restrictive housing market the town sees a continued need for counseling including foreclosure prevention; first-time homebuyer education; financial management counseling; rental-assistance counseling; and fair housing counseling. Additionally, there is a need for assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless.

There is also an ongoing need in the Town and region to provide temporary housing and supportive service programming to help the victims of domestic violence and their families to escape violence and become self-sufficient. Call statistics from recent years provided by area domestic violence service agencies have indicating a growing need for assistance in the Town of Amherst.

The Town of Amherst is also committed to supporting the senior population through investments in new programming at the Senior Center, as well as investments in senior transportation services.

And there are ongoing needs to provide safe and healthy recreational opportunities for the Town's youth. The Town recognizes a need to invest in after-school and summer programs, as well as community-based policing and outreach.

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

The Consortium facilitated a series of stakeholder interviews requesting feedback on needs across the community and the Town of Amherst circulated a Community Development Needs Survey to

Department Heads and stakeholder organizations whereby they identified and prioritized community needs related to public facilities, public services and infrastructure, planning, and housing.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

According to the Buffalo Niagara Association of Realtors, consistent with national and regional trends, the median price of home sales within the Town of Amherst has continued to significantly increase. From 2019 to 2024, the median sale price has increased 31%, from \$253,000 to \$332,000 on the heels of a 69% increase over the prior five years. In comparison, Erie County has seen a 62% increase over the same period from \$166,900 to \$269,755. In spite of the increase within the Town, there remains a very strong demand to buy or rent in Amherst, supported by the fact that, for the last three years, sale prices have continued to match or exceed asking prices in Amherst demonstrating the pressure that lack of supply to meet the demand is putting on housing costs.

Despite increasing costs, 59.7% percent of homeowners with a mortgage in the Town of Amherst are paying less than 20% of their income towards housing costs. A total of 18,794 out of 22,484 homeowners (83.5%) are within the recommended guideline of paying no more than 30% of income on housing costs. These numbers do not reflect the increase in mortgage rates over the last 2-3 years, so it is likely that the percentages will increase along with the cost of financing.

Percent of Income	Number	Number
Less than 20.0%	13,431	59.7%
20.0 to 24.9%	3,445	15.3%
25.0 to 29.9%	1,918	8.5%
30.0 to 34.9%	837	3.7%
35.0% or more	2,853	12.7%
Total	22,484	100.0%

**Table 40– Amherst Housing Cost for Homeowners with Mortgage**

*Source: 2022 ACS 5-Year Estimates*

The estimated 2022 median contract rent in Amherst was \$1,174, significantly higher than the other ACT Consortium towns, and median gross rent was \$1,278, an approximately 34% increase in rents since the 2019-2024 Consolidated Plan.

Rent Range	Contract Rent		Gross Rent	
	Number	Percent	Number	Percent
Less than \$500	1,350	9.2%	1,100	7.5%
\$500-999	3,809	25.9%	2,834	19.2%
\$1,000-1,499	5,849	39.7%	5,727	38.9%
\$1,500-1,999	2,296	15.6%	3,250	22.1%
\$2,000-2,499	831	5.6%	1,130	7.7%
\$2,500-2,999	101	0.7%	184	1.2%
\$3,000 or more	495	3.4%	506	3.4%
Total	14,731	100.0%	14,731	100.0%
Median rent	\$1,174		\$1,278	

**Table 41 - Amherst Contract and Gross Rent**

*Source: 2022 ACS 5-Year Estimates*

The higher rents create a situation where the cost burden of housing tends to impact renters in Amherst more than homeowners. The table below shows 37.5% of renters in the Town to be cost burdened compared to 15.3% of homeowners. In each case the percentage of individuals experience cost burden declines as incomes increase.

Household Income	Own		Rent		Total	
	#	% Cost Burdened	#	% Cost Burdened	#	% Cost Burdened
Less than \$20,000	1,607	94.4%	2,919	85.3%	4,526	88.5%
\$20,000 to \$34,999	2,514	59.1%	2,856	88.3%	5,370	74.7%
\$35,000 to \$49,999	2,498	33.8%	1,884	67.7%	4,382	48.4%
\$50,000 to \$74,999	4,557	18.5%	2,801	41.7%	7,358	27.3%
\$75,000 or More	25,386	3.5%	3,836	10.6%	29,222	4.4%
<b>Total</b>	<b>36,562</b>	<b>15.3%</b>	<b>14,296</b>	<b>37.5%</b>	<b>50,858</b>	<b>26.4%</b>

**Table 42 - Tenure and Income in Amherst**

*(Source: 2018-22 ACS)*

Market conditions are creating a situation where most of the new development in the Town is either high density, often publicly subsidized housing, or large single-family homes in new subdivisions. These conditions limit the housing diversity in the Town and can potentially price the working class out of the market. As a result, Town planners are looking at ways to incentivize development of smaller housing units, housing clusters ranging from 4-12 units, and accessory dwelling units to allow families to live together in an affordable manner.

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

### Introduction

The housing market within the HOME Consortium consists of more mature suburban towns nearest to the City of Buffalo, with many residents commuting into the City. The following tables give a sense of the housing stock within the 'first ring suburbs' constituting the Consortium.

### All residential properties by number of units

The mix of housing type within the Town of Amherst is predominantly single family with 91.3% falling under this category for owner occupied units. For renters, 31.8% are in one or two-unit properties, 36.8% in three to nine-unit properties, and 30.8% in properties with more than 10 units. This division skews significantly more toward 5-9 and 10 or more units than the other ACT Consortium communities, which is partially reflective of housing to accommodate students.

Category	Owner		Renter	
	Number	Percent	Number	Percent
1-detached	31,616	86.0%	1,294	8.4%
1-attached	1,958	5.3%	862	5.6%
2	696	1.9%	2,733	17.8%
3 or 4	659	1.8%	3,143	20.4%
5 to 9	1,232	3.4%	2,523	16.4%
10 to 19	212	0.6%	723	4.7%
20 to 49	131	0.4%	1,355	8.8%
50 or more	178	0.5%	2,653	17.3%
Mobile Home	67	0.2%	44	0.3%
Boat, RV, van, etc	13	0.0%	45	0.3%
<b>Total</b>	<b>36,762</b>	<b>100.0%</b>	<b>15,375</b>	<b>100.0%</b>

**Table 43—Amherst Number of Units in Structure**

*Source: 2022 ACS 5-Year Estimates*

Property Type	Number	%
1-unit detached structure	84,285	65%
1-unit, attached structure	4,110	3%
2-4 units	22,260	17%
5-19 units	10,380	8%
20 or more units	7,490	6%
Mobile Home, boat, RV, van, etc	1,560	1%
<b>Total</b>	<b>130,085</b>	<b>100%</b>

**Table 44 – ACT Consortium - Residential Properties by Unit Number**  
2016 – 2020 CHAS

**Unit Size by Tenure**

	Owners		Renters	
	Number	%	Number	%
No bedroom	120	0%	1,750	5%
1 bedroom	1,380	2%	7,500	21%
2 bedrooms	12,925	15%	17,910	49%
3 or more bedrooms	72,195	83%	9,200	25%
<b>Total</b>	<b>86,620</b>	<b>100%</b>	<b>36,360</b>	<b>100%</b>

**Table 45 – Unit Size by Tenure**  
2016 – 2020 CHAS

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

Belmont Housing Resources maintains an inventory of affordable housing opportunities for Erie County and reports there are 29 assisted housing developments located within the three towns of the ACT Consortium. This inventory consists of a total 3,317 assisted living units, including 1,252 units for families and 2,001 units for seniors. All units are available to households of low- and moderate-income (under 80% of the area median income).

Belmont Housing Resources administers the Section 8 housing voucher program and currently has 5,513 vouchers under contract, which has remained relatively steady. Based on data provided by Belmont Housing Resources, it was calculated that as of mid-2024, there were 902 households residing in the Consortium towns who were voucher holders. This included 451 in Cheektowaga, 274 in Tonawanda, and 177 in Amherst.

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

The National Housing Trust maintains a database on expiring project-based rental assistance (PBRA) units, which includes project-based Section 8, Section 202, Section 811, RAP, LIHTC, and HOME units. According to this database, a total of 87 Section 202/811 rental assisted units located within the Amherst-Cheektowaga-Tonawanda HOME Consortium will expire over the next five years.

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

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

No. Like most other areas in the nation, the ACT HOME Consortium continues to experience a significant shortage of affordable housing. For example, as of September 2024, of the 5,513 vouchers Belmont has issued, 1,240 (22.5%) are held by individuals that are trying to find housing. In June 2024 Belmont was able to open the waiting list for vouchers for the first time since 2011 and subsequently closed it after receiving 9,000 applications within five days. The Rental Assistance Corporation (RAC) has been unable to open the waiting list since receiving 7,000 applications in 2019 and still carrying a back log.

Regardless of the subject matter, members of the stakeholder groups turned the conversation to a lack of housing in the region and the resultant affordability problems. There were repeated mentions of the need affordable housing and senior housing, as well as the need to improve the quality of existing units and the fact that too few of the existing units are on public transportation routes to get to and from employment opportunities and needed services.

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

Need for housing can be ascertained to some degree by the types of households that are users of the Section 8 vouchers administered by Belmont Housing Resources. Belmont reports that 66% of the households assisted through the Erie County Section 8 program are elderly or disabled.

### **Discussion**

Every effort must be made to provide quality affordable housing and to provide housing stability. Due to increasing costs to develop new units, the Consortium communities have put a significant portion of their CDBG resources into rehabilitation to address housing problems for low and moderate income residents. Although rehab programs administered by the Community Development Departments in each of the three towns are not large volume producers due to limited funds, sustained effort over a number of years, especially within target areas, can positively impact neighborhood stabilization and leverage additional private investment in home repairs.

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

### Introduction

Consistent with regional and national trends, housing costs have increased significantly within the Consortium. According to HUD the Fair Market Rent (FMR) in the Consortium for a two-bedroom apartment is \$1,163. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn \$3,877 monthly or \$46,520 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a “Housing Wage” of \$22.37.

In New York, a minimum wage worker earns an hourly wage of \$16/hour. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 50-plus hours per week, 52 weeks per year.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

**Table 6 – Cost of Housing**  
2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

The above Cost of Housing HUD table was not populated. Median home values and median contract rents are shown in subsequent tables by each town, which is more relevant information.

Rent Paid	Number	%
Less than \$500	5,264	14.5%
\$500-999	21,359	58.8%
\$1,000-1,499	6,690	18.4%
\$1,500-1,999	1,760	4.8%
\$2,000 or more	1,275	3.5%
<b>Total</b>	<b>36,348</b>	<b>100.0%</b>

**Table 47 - Rent Paid**  
2016 – 2020 ACS

## Housing Affordability

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 2,250 rental units identified as affordable to households below 30% of HUD Area Median Family Income (HAMFI) represents 6.8% of the rental housing inventory in the Consortium.

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	2,250	No Data
50% HAMFI	9,214	7,724
80% HAMFI	21,406	22,502
100% HAMFI	No Data	32,549
<b>Total</b>	<b>32,870</b>	<b>62,775</b>

**Table 48 – Housing Affordability**  
2016 – 2020 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	951	992	1,163	1,424	1,604
High HOME Rent	951	992	1,163	1,424	1,604
Low HOME Rent	848	909	1,091	1,260	1,406

**Table 49 – Monthly Rent**  
HUD FMR and HOME Rents

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

No there is not. As noted, home values and rents have been increasing dramatically. Attendees of the community and stakeholder meetings brought up housing prices and the lack of supply at all levels of affordability in the western New York market as the most significant challenge the region is facing. It is feared that continued cost increases, along with rising interest rates, will continue to price some people out of the market, while also disempowering renters in a high demand, low supply market. The Towns within the Consortium are all focused on using federal resources to support rehabilitation programs to allow low and moderate income individuals to make needed investments in their residences to maintain safety and quality of life, and to avoid being displaced into an extremely tight housing market.

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

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

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

	Amherst			Cheektowaga			Tonawanda		
	2017	2022	% Change	2017	2022	% Change	2017	2022	% Change
Median Homes Value	\$ 186,600	\$ 262,800	40.84%	\$ 104,800	\$ 151,900	44.94%	\$ 124,200	\$ 181,400	46.05%
Median Contract Rent	\$ 918	\$ 1,174	27.89%	\$ 682	\$ 852	24.93%	\$ 685	\$ 891	30.07%

**Table 50 – Median Home Value and Contract Rent**

*Source: 2017, 2022 ACS Five Year Estimates*

The above table shows median contract rents have increased tremendously in each of the ACT towns ranging from a 24.93% increase in Cheektowaga to a 30.07% increase in Tonawanda, with Amherst between the two. The Towns have each seen an even larger increase in median home value, ranging from 40.84% in Amherst to 46.5% in Tonawanda.

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

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

## Introduction

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

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

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

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

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

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

## Condition of Units

The following table indicates the number of housing units by tenure that experience housing conditions as defined above. Renter units have a significantly higher prevalence of housing units with at least one selected condition, with 46% of renter-occupied units in the Consortium having at least one selected condition compared to only 15% of owner-occupied housing units. Very few owner- or renter-occupied units have more than one condition. Based on information presented under NA-10 – Needs Assessment, the predominate condition experienced by households is the cost burden that comes with having a housing cost which is in excess of 30% of income.

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	13,365	15%	16,675	46%
With two selected Conditions	240	0%	755	2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With three selected Conditions	25	0%	105	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	73,010	84%	18,820	52%
<b>Total</b>	<b>86,640</b>	<b>99%</b>	<b>36,355</b>	<b>100%</b>

**Table 51 - Condition of Units**  
2016-2020 CHAS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	3,124	4%	3,650	10%
1980-1999	9,913	11%	6,025	17%
1950-1979	52,270	60%	19,035	52%
Before 1950	21,310	25%	7,640	21%
<b>Total</b>	<b>86,617</b>	<b>100%</b>	<b>36,350</b>	<b>100%</b>

**Table 52 – Year Unit Built**  
2016 – 2020 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	73,580	85%	26,675	73%
Housing Units built before 1980 with children present	2,352	3%	1,459	4%

**Table 53 – Risk of Lead-Based Paint**  
2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

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

As reported in NA-10 Needs Assessment, only a very small percentage of housing units are substandard in that they lack complete kitchen facilities or lack complete plumbing. The most available measure of units in need of rehabilitation are the actual counts of housing rehabilitation eligible projects that each town conducts annually. The Housing Rehabilitation Program completes approximately 60 projects annually and has roughly 90 projects underway annually, and another 50 households on the program's waiting list at any given time.

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

### Totals Number of Units

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

**Table 54 – Total Number of Units by Program Type**  
*PIC (PIH Information Center)*

### Describe the supply of public housing developments:

The Kenmore Housing Authority (KHA) owns and operates two senior citizens housing developments, Kenmore Village Apartments and Theaters Apartments. The apartments are next to each other on one site and each contains 97 units.

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Kenmore Housing Authority has undertaken a number of projects over the last eight years to modernize the facility, increase accessibility, and improve the resident experience. In that time, the KHA has invested in new parking spaces, new window, a significant elevator repair, 15 security cameras, replacement of aging kitchen cabinets and countertops, and a largescale bathroom renovation project that improved accessibility by widening entrances and adding grab bars in bathrooms that did not already have them.

## Public Housing Condition

Public Housing Development	Average Inspection Score
HUD Inspection 2018	91

**Table 55 - Public Housing Condition**  
*HUD IDIS*

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

The KHA plans to invest in upgrades to the HVAC system in the two properties, in order to increase efficiency and air quality, while also improving the comfort of the units. The KHA's mission is to provide safe, clean, and affordable housing to eligible families by:

- Recognizing the residents as the ultimate customer.
- Assuring fiscal integrity and responsibility taking into account changes in federal funding.
- Improving administrative and maintenance efforts through effective and efficient management of staff.
- Undertaking major and needed capital improvements (modernization) to the interior and exterior of both housing developments.

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

### Introduction

Historically, poverty has typically been viewed as the primary factor leading to homelessness. While that remains accurate, stakeholders this year spoke to the pressure on all levels of the housing market as a significant contributing factor. A lack of supply is the driving force behind the housing market issues, but the problem is exacerbated by a lack of available credit due to higher interest rates and lower average household savings. The shortage not only affects homebuyers, but also renters, because the increased demand gives landlords increased leverage. Often times, the tenants affected by these issues are the closest to being homeless and are the least likely to know their rights and be able to exercise them. The housing shortage and difficulty in ensuring fair housing practices appear to be reaching all areas, including Amherst and the other suburban towns within the ACT HOME Consortium. Because homelessness in these towns is not as concentrated or as visible as in the nearby City of Buffalo, there are no homeless shelters located within the ACT Consortium footprint. Therefore, the response to homelessness in these communities can't be measured by the number of available shelter beds, but rather by a wholistic approach that attempts to address the systemic issues that lead to homelessness.

The Town of Amherst does not receive Emergency Solutions Grant Program funding and cannot directly assist the homeless or provide affordable housing for the homeless using HUD funding. Instead, the Town focuses on avenues to reduce the risk of homelessness through social programming and on increasing the supply of affordable housing. Amherst works with Buffalo Urban League and Belmont Housing Resources for WNY to provide housing counseling; Erie County's Haven House to provide services to persons escaping domestic violence; the AIDA to generate workforce –affordable units in new market rate housing complexes; and Private developers seeking gap financing for low-income affordable housing development. Recently, Amherst's HOME Rental Subsidy program provided gap financing for a 93-unit affordable housing project in the Village of Williamsville, and a new 46-unit affordable senior housing project near the Boulevard Mall.

The Homeless Alliance of Western New York (HAWNY) is the main regional agency addressing issues of homelessness. They act as an umbrella organization that coordinates funding, services and collaboration among area agencies and services for the homeless. HAWNY convenes regular meetings between the various agencies and advises the Town of Amherst on homeless issues and related outreach efforts.

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

The bulk of the health, mental health, and employment programs that benefit homeless individuals and those at risk of becoming homeless are regional in nature. 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 people. These organizations

provide many services to homeless or at-risk residents, including, but not limited to, life skills, alcohol and drug abuse treatment, mental health treatment, AIDS related treatment, education, employment assistance, childcare, transportation, counseling, parenting classes, and housing placement/assistance. 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.

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, 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 Urban League Employment Program
- Buffalo Urban League Multi-Service Center
- Educational Opportunity Center
- Employment and Service Center
- 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 people. 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.**

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. Law enforcement is also available to assist victims of domestic violence in emergency situations who are at risk of becoming homeless through the Town of Amherst Police Department Family Offense Squad. In addition, the Family Justice Center assists in placement of homeless persons/families escaping domestic violence situations. Erie County Social Services and the Homeless Alliance have contracted with some Amherst area motels to provide emergency shelter for several people identified as homeless in the region.

Hearts for the Homeless emergency shelter continues to operate a mobile soup kitchen/food pantry. The mobile pantry travels throughout the Towns in the Consortium and the City of Buffalo to find homeless people on the street and provide food and clothing. At that time, the homeless are assessed as to their needs and referred to proper agencies.

Compass House continues to enable youth to move to permanent housing and defray rent and utility arrears to prevent eviction and/or termination. The YWCA of the Niagara Frontier has utilized ESG funding in the past and runs Homelessness Prevention and Rapid Rehousing activities in the Town of Tonawanda, providing rental assistance, utility payments, and security deposits to create housing stability for clients. The YWCA also works with victims of domestic violence and their families to provide 'safe havens' and support services. 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.

As noted in SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, the Consortium towns utilize the services of Child & Family Services – Haven House and the Matt Urban Center to address needs of the homeless community through youth services, food pantries, housing and shelter services, and homeless outreach through the Matt Urban HOPE Center. The Consortium towns also contract for services that can help prevent homelessness such as Belmont Housing of WNY, Housing Opportunities Made Equal, and the Buffalo Urban League providing counseling and services to individuals and families such as financial counseling and intervention with mortgagors, intervention in landlord disputes, financial management counseling, rental-assistance counseling; and fair housing counseling.

To deal with increased housing values, the Town of Amherst amended its first-time homebuyer program in September of 2023 to not only provide closing cost assistance but to provide up to \$50,000 in down payment and or closing cost assistance. HOME funds are also used to purchase foreclosed, vacant and deteriorated residences in Amherst for rehabilitation (or demolition/new construction) and eventual resale to an income eligible first-time homebuyer. This activity is accomplished in conjunction with the Town's designated Owner Developer, New Opportunities Community Housing Development Corp.

While there is no public housing in the Town of Amherst, there are five large affordable (subsidized) family housing complexes in the Town that have rental assistance through project specific vouchers and many individual rental units that are Housing Choice Voucher-approved. The Town is also host to eleven subsidized senior housing complexes that offer affordable options to the Town's aging population. The Town of Amherst has been the lead community in the Erie County Public Housing Authority Consortium since the Consortium's inception in the late 1970's, and oversees the financial accountability of the PHA Consortium, administered by Belmont.

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

### Introduction

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

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

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

In the Town of Amherst, over 20% of the population is aged 65 and over. This population has a poverty rate of 9.3%. Many senior households live in older homes that suffer from deferred maintenance or are no longer accessible to aging occupants. These individuals often lack the disposable income for the necessary upkeep or to make modifications needed to allow the residents to age in place. The elderly and frail elderly also face issues of food insecurity (difficulty in accessing or preparing healthy food) and difficulty in accessing necessary support services either due to a lack of transportation or issues in navigating multiple support networks.

In the Town of Amherst, nearly 10% of the population has some form of disability, with the highest percentages having a cognitive difficulty, an ambulatory difficulty, and/or an independent living difficulty. For persons with mental, physical, and/or other development disabilities access to affordable and accessible housing is a particular challenge. Rising housing costs create a barrier for individuals with disabilities, who tend to have lower incomes than individuals without disabilities. According to the 2018-2022 ACS, median earnings for individuals with disabilities residing in Amherst can be anywhere from \$17,000 to nearly \$28,000 lower than the median earnings for individuals without disabilities depending on whether the individual is male or female. Other barriers to housing include a lack of accessible housing stock. Other challenges include a need for greater support services and a lack of public transportation which makes accessing available support services difficult. Barriers to employment are also a challenge. According to the 2018-2022 ACS, the unemployment rate for individuals with disabilities in Amherst who are in the Civilian Labor Force is 9.9%, significantly higher than any other protected class.

Stakeholders have also noted a significant increase in the number and severity of domestic violence cases. This has created an increased need for support services, including emergency housing,

transitional housing, and counseling and assisting victims of domestic violence in reestablishing their lives.

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

Erie County NYConnects provides information regarding a variety of support services and programs to assist individuals with disabilities and older adults, including those transitioning from institutional settings. Western New York Independent Living, Inc. provides transition from a nursing home or hospital and assists in providing information to individuals about “transitioning” or diversion from costly institutions, such as hospitals, nursing homes and/or psychiatric hospitals, through community based and independent living programs and skills. The Town of Amherst also maintains a Senior Outreach Services (SOS) program that provides case management services that includes help in meeting discharge needs, assistance in accessing community and government programs, and referrals to housing options and accessibility home improvement programs.

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

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

Housing Related Activities and Services

- Provide HUD-funded incentives to leverage the development of affordable rental housing units for vulnerable populations such as seniors or disabled adults.
- Promote Home Ownership for Low-Moderate Income Households by providing down payment and closing cost assistance to first-time low-to-moderate income home buyers through the First-Time Homebuyer Program.
- Provide low or no interest loans to eligible homeowners through the Housing Rehabilitation Program for necessary repairs, including improvements to enhance accessibility, and grants to eligible Veterans to fund necessary housing repairs.
- Assist low income homeowners with weatherization assistance through the Weatherization Assistance Program to ensure safe affordable energy efficient housing.
- Provide fair housing counseling services through Housing Opportunities Made Equal.
- Provide housing related services through Belmont Housing Resources for WNY who 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; and assist renters in resolving disputes with landlords; all of which assist in preventing homelessness.

- Provide housing counseling services through the Buffalo Urban League who provides housing counseling 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.

#### Activities Relating to Other Supportive Services

- Provide public services through the YWCA of WNY, who works with victims of domestic violence in Amherst and throughout the Consortium
- Contract with Child & Family Services of Erie County- Haven House to provide a domestic violence advocate
- The Town of Amherst has contracted with Child & Family Services of Erie County-Haven House to provide a domestic violence advocate. They work directly with the Police Department.
- Support the Amherst Senior Center's Meals on Wheels program to provide affordable meals to seniors
- Support transportation assistance for seniors through the Amherst Senior Transportation Services.
- Support improvements to the Senior Center, including upgrades to equipment in the Senior Center kitchen which supports the congregate dining, frozen meals, and Meals on Wheels programs, replacement of existing sound system, replacement of front desk to be ADA compliant, and repairs to curb cut and sidewalk and installation of bollards to enhance safety

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

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

A joint Analysis of Impediments to Fair Housing Choice (AI) was completed in 2019 and submitted to HUD on February 14, 2020, for the Erie County CDBG Consortium; City of Buffalo; Amherst, Cheektowaga, Tonawanda Consortium; and the Town/Village of Hamburg. Barriers to affordable housing identified in the 2019 AI included, lack of supply, unaffordable housing costs, lack of funding, and the Not in My Back Yard (NIMBY) sentiment. An updated AI has been prepared for Erie County CDBG Consortium; City of Buffalo; Amherst, Cheektowaga, Tonawanda Consortium; and the Town/Village of Hamburg in conjunction with the preparation of the Consolidated Plan. The significant barriers identified in the 2024 AI for the Town of Amherst include:

**Homelessness:** The number of people experiencing homelessness within Erie County has nearly doubled since 2019, likely driven by the end of the COVID eviction moratorium and increasing housing costs. An overall lack of housing at all price points has contributed to increased rents and home values across the board, further reducing housing options for the most vulnerable. Suburban communities such as Amherst also have limited transportation options, and the suburban environment creates a proximity issue for co-locating shelters near supportive services. Adding to these conditions is a lack of permanent affordable housing units locally and limited number of tenant-based vouchers available, all of which makes it difficult to keep people housed or transition people out of homelessness.

**Lack of Affordable Housing:** The lack of affordable housing in Erie County is particularly acute in the suburban communities such as Amherst, which have the greatest employment opportunities. NIMBYism, zoning restrictions, land values, and other policies make it difficult to provide affordable housing near workplaces. Most new housing in Amherst is market-rate multi-family, with a significant share developed as off campus housing targeting university students. In addition, investment ownership of starter homes for short-term or student rentals has driven bidding wars, increasing the value of lower-end stock and creating a challenge for lower income buyers to find appropriate housing. Access to affordable housing is also limited by an inadequate supply of vouchers and the limited number of landlords willing to accept vouchers tenants.

**Public Impediments:** The zoning ordinance for the Town of Amherst is fairly typical of ordinances across Erie County. There are limitations that impact the potential for development of multi-family and other lower cost residential options, as well as limited availability of land for higher density projects. Single family detached units are allowed in all multi-family zones, which may result in the already limited multi-family zoned land being developed as single family. Lot coverage requirements of 35-40 percent also add to the cost of development. This is an area where conflict often occurs because of the public interest to limit impervious cover conflicts with a desire for density and affordability.

Outside of targeted geographic areas, density is limited. The highest density allowed for multi-family housing is 12 -60 units per acre and one multi-family district is limited to Senior Housing. The Town's parking requirements also add to costs, with two parking spaces per unit required. This can add significant cost for a developer wanting to put in one bedroom or studio units as an affordable option. However, the Town's ordinance does permit the use of an alternative parking analysis to reduce the parking ratios required. In 2019, the Town of Amherst adopted Mixed Use Zoning and Retrofit Districts to provide for higher-density in-fill development allowing a mixture of residential and commercial uses and rezoned 2,424 acres to mixed-use districts.

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

## Economic Development Market Analysis

### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	86	90	0	0	0
Arts, Entertainment, Accommodations	5,795	11,094	12	13	0
Construction	1,369	1,352	3	2	-1
Education and Health Care Services	9,928	19,034	21	22	1
Finance, Insurance, and Real Estate	4,703	13,758	10	16	6
Information	1,032	950	2	1	-1
Manufacturing	3,667	2,448	8	3	-5
Other Services	2,056	3,111	4	4	-1
Professional, Scientific, Management Services	6,199	11,243	13	13	0
Public Administration	0	0	0	0	0
Retail Trade	5,753	12,206	12	14	2
Transportation and Warehousing	1,358	906	3	1	-2
Wholesale Trade	2,286	4,044	5	5	0
Total	44,232	80,236	--	--	--

**Table 56 - Business Activity**  
 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	63,292
Civilian Employed Population 16 years and over	60,975
Unemployment Rate	3.66
Unemployment Rate for Ages 16-24	7.43
Unemployment Rate for Ages 25-65	2.59

**Table 57 - Labor Force**  
2016 – 2020 ACS

Occupations by Sector	Number of People
Management, business and financial	21,620
Farming, fisheries and forestry occupations	2,215
Service	4,409
Sales and office	13,750
Construction, extraction, maintenance and repair	2,085
Production, transportation and material moving	1,645

**Table 58 – Occupations by Sector**  
2016 – 2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	45,456	81%
30-59 Minutes	9,135	16%
60 or More Minutes	1,346	2%
<b>Total</b>	<b>55,937</b>	<b>100%</b>

**Table 59 - Travel Time**  
2016 – 2020 ACS

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,234	70	1,180
High school graduate (includes equivalency)	4,140	154	1,905
Some college or Associate's degree	11,040	430	2,520
Bachelor's degree or higher	30,905	855	4,170

**Table 60 - Educational Attainment by Employment Status**  
2016 – 2020 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	60	105	385	474	825
9th to 12th grade, no diploma	690	495	164	859	1,000
High school graduate, GED, or alternative	3,285	1,000	1,280	3,915	5,935
Some college, no degree	8,185	1,935	1,609	4,705	4,475
Associate's degree	910	950	1,279	3,595	2,225
Bachelor's degree	2,410	5,395	4,564	8,935	5,560
Graduate or professional degree	295	4,490	4,845	7,740	6,230

**Table 61- Educational Attainment by Age**  
2016 – 2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	58,331
High school graduate (includes equivalency)	86,666
Some college or Associate's degree	147,783
Bachelor's degree	177,949
Graduate or professional degree	222,355

**Table 62 – Median Earnings in the Past 12 Months**  
2016 – 2020 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 21% of employed residents, followed by Professional, Scientific, Management Services at 13%, Arts, Entertainment, Accommodations and the Retail Trade sector which each employ 12% of Township residents, and Finance, Insurance, and Real Estate which employ 10% of residents.

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

While the Western New York Region has struggled with a declining population and labor market, the Town of Amherst has managed to experience positive growth, undergoing consistent household base expansions while developing a strong employment base. In September 2023 the Town of Amherst completed a Strategic Economic Development Plan (SEDP). As it relates to workforce and infrastructure needs, the SEDP found the following:

- Target industries include Healthcare Services and Medical Tourism, Professional Services and Information Technologies, Cottage Manufacturing, and Entrepreneurial Development.
- Amherst’s population experienced a moderate increase while the Buffalo MSA’s population experienced a moderate decrease.
- Amherst’s labor market is vulnerable to shortages as the senior population increases and the prime-working age population (35-64) decreases.
- Housing diversity integrated with urban amenities will be critical to long-term economic sustainability.
- Developing live-work-recreate activity centers can be a tool to attract workers.

The SEDP further documents that since 2010, the Town of Amherst has lost more jobs than it has gained, largely due to the impact of the COVID-19 pandemic. Public higher-educational institutions, which comprise a large proportion of Amherst’s workforce, sustained major job losses due to the transition to online learning. The pandemic also caused many workers to reconsider their long-term job prospects, in-favor of opportunities with higher-earnings potential and stability. This particularly impacted service-based workers in Retail Trade and Food-Accommodation industries.

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

The Town of Amherst offers a wide variety of economic development opportunities in all major sectors due to its large size, dense population, high traffic count, available infrastructure, and existing industrial, commercial, and service industries. However, a decline in the demand for older business parks, which was exacerbated by changes in work patterns during the COVID-19 pandemic, and vacancies in retail space, caused by changes in retail trends and on-line shopping, have created economic development needs and related opportunities for the Town.

Consistent with its Comprehensive Plan, in order to sustain the viability and value of its neighborhoods and commercial areas, the Town of Amherst has a need to advance the redevelopment and revitalization of underutilized, obsolete, and vacant commercial and office properties. This can occur through reinvestment in updates to accommodate existing or similar uses; an adaptive reuse where existing buildings are retained but are converted or adapted for new uses; or partial or full redevelopment, where existing buildings and land uses are partially or fully replaced to allow for existing or new uses.

The Town of Amherst has initiated an extensive urban renewal effort targeting the former Boulevard Mall properties and surrounding areas in the Boulevard Central District. The Boulevard Mall, once a thriving commercial hub in Amherst, has suffered significant decline due to changing retail trends, online shopping, and regional economic challenges. Located at the center of the Boulevard Central District area of Town, the property's value and occupancy rates have plummeted, with assessed value dropping by over 62% since 2009 and rental income declining by 71.6% from 2016 to 2019. Persistent vacancies, loss of businesses and jobs, deteriorating infrastructure, and underutilized parking lots have further highlighted its blighted state. Legacy leases, fragmented property ownership, and adjacent utility infrastructure complicate redevelopment efforts. Public and media commentary underscores the mall's decline, calling it emblematic of the broader struggles of traditional retail spaces. The Boulevard Mall's deterioration has negatively impacted the Town's tax base, economic vitality and employment opportunities, underscoring the urgency for revitalization and redevelopment.

The Town's Urban Renewal Plan, formally adopted in October 2022, outlines phased redevelopment of the Urban Renewal Area and Boulevard Mall Properties, prioritizing economic revitalization and community enhancements. The plan includes acquiring properties through Eminent Domain to address blight and economic stagnation to transform the district into a walkable hub featuring residential, commercial, and recreational spaces. The redevelopment aligns with long-term goals, such as the Town's Comprehensive Plan and other strategic frameworks, while leveraging federal and state programs to benefit low-to-moderate income populations and incorporate affordable housing. By addressing underutilized and deteriorating properties in the District, the Town seeks to stimulate investment, generate jobs, and improve quality of life for residents.

On a regional level, investments by New York State in programs to encourage the commercialization of academic research can help advance Amherst's goal, as stated in its Comprehensive Plan, of capitalizing on the presence of the University of Buffalo in the Town as a driver of job creation. In addition, with the State investing in the medical and biotechnology sectors, as evidenced by growth and development in the Buffalo-Niagara Medical Campus, Amherst has the ability to market itself to biotechnology companies with connections to the Medical Campus based on its proximity to both UB campuses and its viability as a location for research and development. However, success in attracting hi-tech growth industries is dependent on having a skilled workforce to support them.

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

The SEDP found that as of 2022, over 40% of the number of jobs in Amherst are considered 'High-Skilled White-Collar' positions. Many of these positions are represented in traditional white-collar sectors such as -healthcare, finance/insurance, research & development, etc. A significant proportion of High-Skilled White-Collar positions can be considered a boon to the Town's economic development efforts, as many existing workers are equipped with the knowledge and skills to advance entrepreneurial opportunities.

Between 2012 and 2022, nearly 7,500 jobs were lost among semiskilled and low-skilled white-collar professionals. Many of these job losses stem from service-based industries, with most occurring during the COVID-19 pandemic due to social distancing restrictions. The decline of jobs among serviced-based workers can impose detrimental impacts on economic and community development in Amherst. A decrease in service-based jobs can correspond with a reduction of key community services in retail, hospitality, and healthcare.

Major gaps are projected between the county's existing labor market levels and projected 2030 labor market levels in healthcare, community services, and transportation. Workforce development is a critical component towards creating jobs that will help meet project levels.

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

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

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

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

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

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

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

Yes

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

In 2021, the Erie County Industrial Development Agency (ECIDA) finalized a five-year update of its CEDS for 2022-2026. The CEDS encompasses all of Erie County. Given that it was developed amid the COVID-19 pandemic, the CEDS includes planning for economic recovery and long-term resilience. The CEDS includes an action plan built around four goal areas: Infrastructure, Business Support, Quality of Life and Regional Collaboration and also recognizes the interdependence of economic development and community development. As attraction and retention of a qualified workforce become increasingly important to economic development, considerations such as housing, poverty, childcare, transportation and recreation (all traditionally falling within the purview of "community" development) have become important considerations in economic development strategies. Specific goals contained in the CEDS that align with the Consolidated Plan are: expand access to broadband internet services; ensure access and opportunity for a diverse workforce; provide safe, affordable housing for all residents and families; and provide access to affordable childcare.

Additionally, the 2017 Erie County Broadband Feasibility Study identified a lack of essential infrastructure in the form of competitive choices of fiber optic service provider(s) to city, town, and village neighborhoods in the County, other than Verizon FiOS™. While there was a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, the providers either did not target residential or small business or priced their fiber optic services such that they were prohibitively expensive to residential users or small business.

The challenges and changing economic landscape outlined above are provide particular challenges for small businesses in the region. The town of Amherst sees opportunity to foster new economic activity at the former Boulevard Mall property, but also recognizes a need to invest in smaller commercial spaces in the Town and to support small businesses within those spaces. Opportunity exists to provide microenterprise assistance to start-up businesses and small businesses in a position to expand with additional capital. Additionally, there are opportunities to work with commercial and mixed-use property owners to invest in their properties and to improve both accessibility and curbside appeal.

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.

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 workers improve their employment options in the region's increasingly advanced and competitive economy.

## MA-50 Needs and Market Analysis Discussion

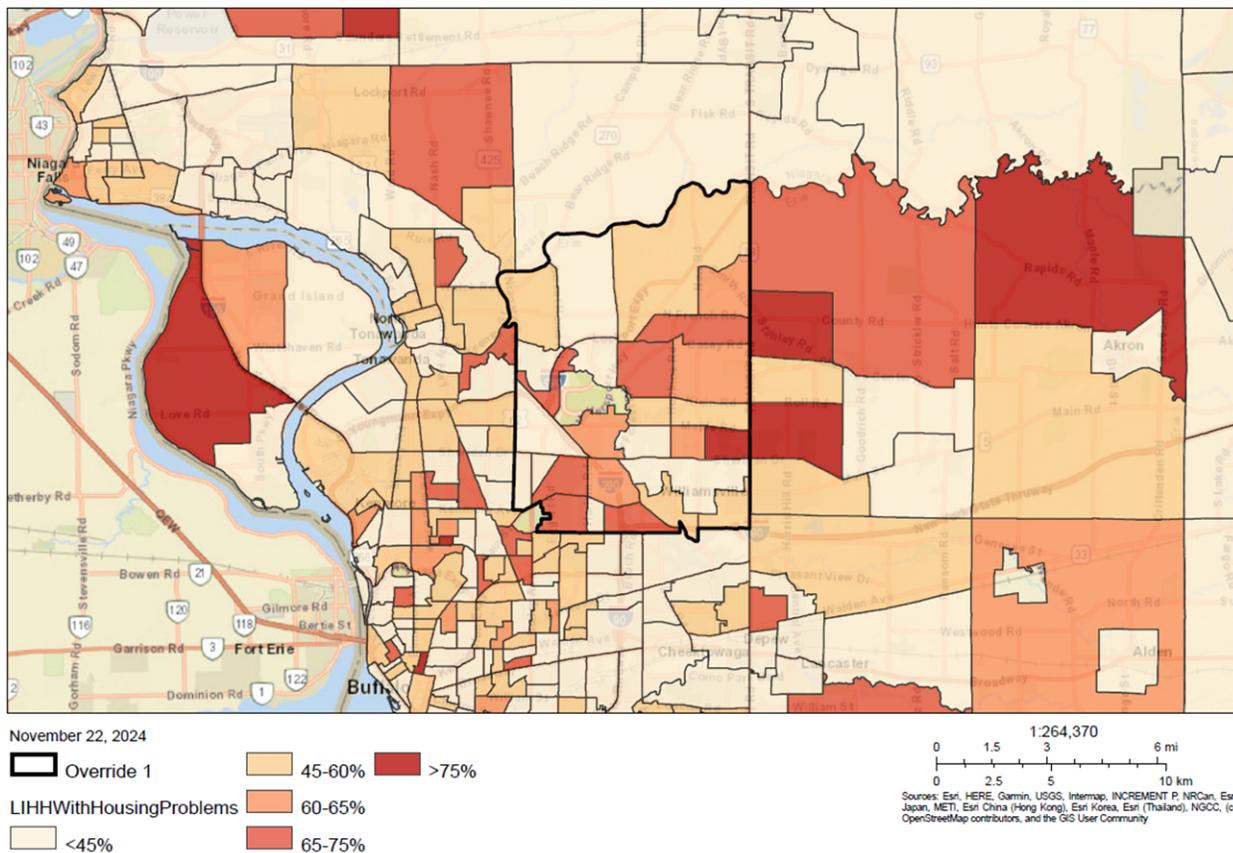
**Are there areas where households with multiple housing problems are concentrated?  
(include a definition of "concentration")**

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

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

Within Amherst, the highest concentration of severe housing problems occur in the southern portion of the Town, specifically between Main Street and Sheridan Drive just west of Transit Road and in the southwestern portion of the Town, in and around Eggertsville.

Town of Amherst - % of LI Households with Any Severe Housing Problem



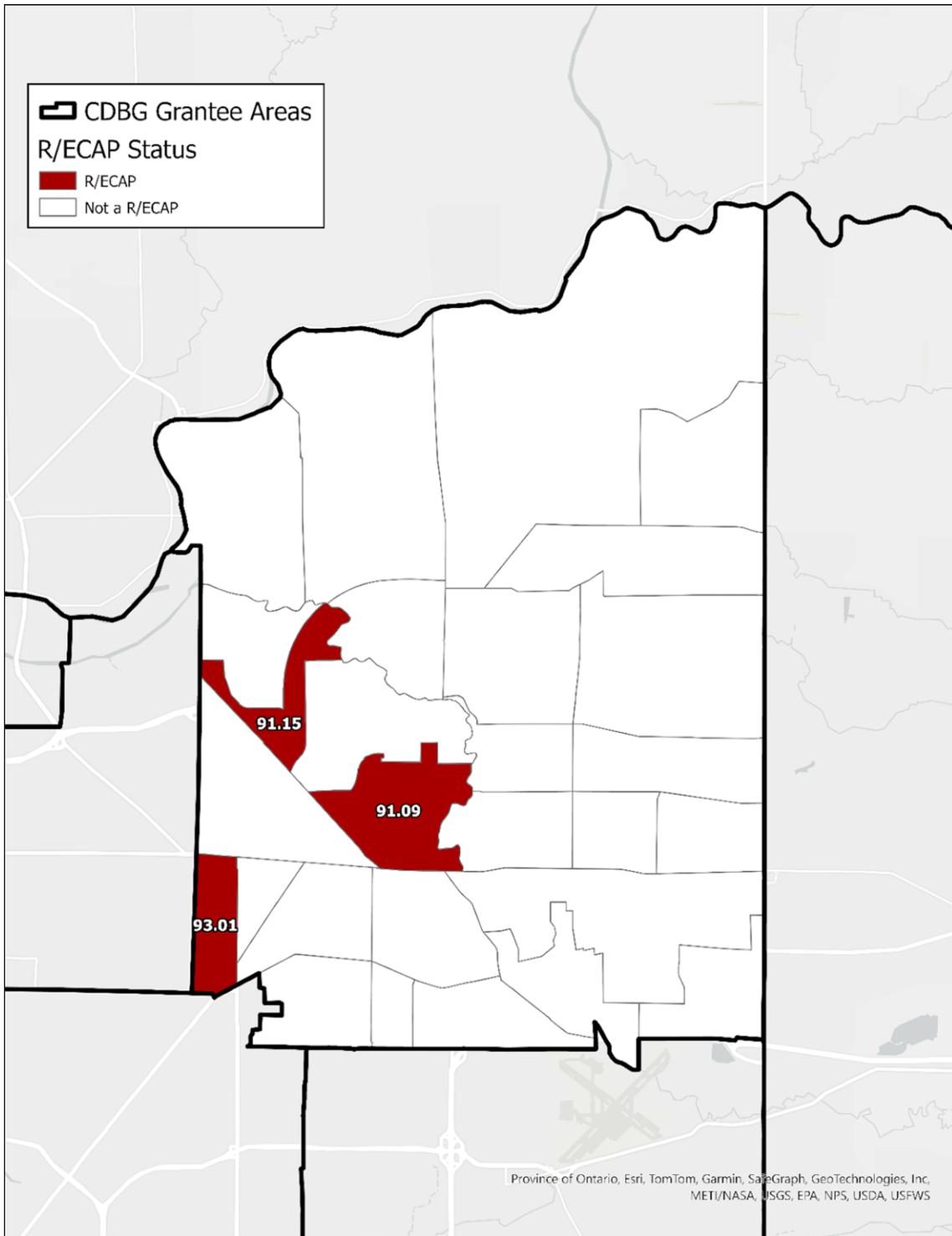
**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

The Analysis of Impediments to Fair Housing Choice (2024) identified three census tracts 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 three census tracts listed below have been identified as concentrated areas of racial and ethnic minorities and low-income populations. Census tracts 91.09 and 91.15 are located around the SUNY Buffalo North (Main) Campus. Census Tract 93.01 is located in the Eggertsville neighborhood.

Tract ID	Population	% Non-White	Poverty Rate
91.09	3,167	31.8%	21.7%
91.15	3,811	41.6%	37.1%
93.01	4,824	39.0%	18.4%

**Table 63 - Town of Amherst - Racially or Ethnically Concentrated Areas of Poverty**  
*Analysis of Impediments to Fair Housing Choice (2024)*



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

The cluster of low-income households in Census Tracts 91.15 and 91.09 are largely affiliated with the SUNY Buffalo North campus, and have high percentage of students in this area as the main reason for the large low-income population here. This area is more renter-occupied than other areas in the Consortium.

The Eggertsville area (Census Tract 93.01) is one of the oldest neighborhoods in the Town and is actively shaped by its proximity to the SUNY Buffalo South campus, various commercial centers, and community services located in Windermere School. This neighborhood is characterized by a density and diversity unique to suburban environments. These factors combine to create unique public safety issues ranging from crime to pedestrian, bicycle, and vehicle interaction which demand increased attention from local agencies including law enforcement.

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

Yes. As a mature first-tier suburb, these areas have significant community assets including diverse housing stock, local businesses, small commercial buildings, community facilities such as public libraries, regional employment centers, social service providers, government offices, and more.

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

Census Tract 93.01 is located just to the south of a federal Opportunity Zone as a result of both the negative impacts of the closure of the Boulevard Mall, but also the potential for reinvestment and reimagining. The Opportunity Zone program provides opportunity for significant private investment in commercial activities, supporting residential structures, and new affordable residential in-fill development. There are large scale, and significant commercial and mixed-use opportunities along Niagara Falls Boulevard and Maple Road that will certainly support Eggertsville as a whole and Census Tract 93.01 specifically.

The proximity to SUNY Buffalo North Campus slightly skews the Census demographics based on the diversity of, and often low-income levels of college students. The campus and surrounding development is ripe for continued mixed-use development and new housing opportunities for all income levels.

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

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

In 2017, 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.

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

There are two predominant broadband service providers in Erie County—Verizon and Spectrum—who offer broadband services to residential and small business customers. Verizon offers digital subscriber lines (DSL) services over their traditional copper plant and high order services across their fiber optic network service called FiOS™. FiOS™ offers plans ranging from 50Mbps to 500Mbps. Verizon's DSL services in Amherst comfortably meet the FCC's or NYS broadband bandwidth requirement of 25Mbps download speed (source: ECC Technologies Erie County Broadband Feasibility Study)

Verizon and Spectrum service levels vary, depending upon the infrastructure and services available in different parts of the County. The study found that while the urban and suburban areas of the County, including the first ring suburbs of the ACT Consortium, are for the most part well served in terms of access and competition, many of the rural areas of the County, which are towns and villages to the south and east, are lacking and expected to fall further behind. The Town of Amherst was shown to be well served in both the residential and commercial markets relative to the region.

The 2017 Study identified a lack of essential infrastructure in the form of competitive choices of fiber optic service provider(s) to city, town, and village neighborhoods within the Consortium, other than Verizon FiOS™. While there was a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, the providers either did not target residential or small business or priced their fiber optic services such that they were prohibitively expensive to residential users or small business.

In 2021, Erie County commissioned ECC Technologies, Inc. (ECC) to develop an OAN Business Plan, including a preliminary route design for a middle-mile fiber optic backbone interconnecting cities, towns and villages throughout the County. In 2022, ErieNet Local Development Corporation (ErieNet), a not-for-profit local development corporation, was formed to develop and operate the OAN, which is to be

comprised of 400 miles of fiber optic backbone comprised of headend and regional points of presence, interconnections to public and private broadband providers, aerial and buried cable pathways, fiber optic cabling and components, and community anchor institutions (CAI's) endpoints. Examples of CAI's include County facilities, 911 centers, libraries, municipal facilities, school district facilities, higher education institutions, healthcare facilities, and other major employers. The dark fiber provided by ErieNet can be used by CAI's for their own network communications and applications and also by telecommunications carriers, Internet Service Providers and other public and private broadband providers to extend and connect their infrastructure to their constituents and customers. Construction and launch of the OAN is being funded with \$34 million in ARPA funds and an additional \$2.8 million in County funding for design and construction management services. Installation has begun and is expected to be completed in mid-2025.

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

### **Vulnerability to Natural Hazard Risks**

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

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

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

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

In 2022 the Erie County commissioned a more detailed Hazard Mitigation Plan that analyzed the risk and readiness of jurisdictions within the County. The report ranked the Town's level of risk for thirteen potential hazards and found low levels for risk for Coastal Erosion, Flood, Hazardous Materials, Landslide, and Wildfire. The report determined that the Town of Amherst has a medium level of risk for Cyber Attack, Earthquake, Expansive Soils, Extreme Temperature, Pandemic, Severe Storm, Severe Winter Storm, and Utility Failure. The Town's adaptive capacity – jurisdiction's current capabilities to adjust to, protect from, or withstand a future hazard event, future conditions, and changing risk – was examined and then ranked as strong, moderate or weak relative to the same thirteen potential hazards. Amherst's adaptive capacity was determined to be strong relative to 11 of the 13, and moderate when it comes to reacting to potential flood events and cyber-attacks.

The Plan recommended nineteen specific actions that the Town should take to improve readiness and resilience, that included protection of specific public facilities and infrastructure such as the Skimmersville and Lang Brewery Dams, Getzville Fire Station and Ellicott Creek Volunteer Fire Company, North Amherst Fire Station, Fire Training Facility, the wastewater pump station, and BLK Buffalo facility. Additionally, the Plan recommended clearing debris from Ellicott Creek, implementing flood protection measures along Gott Creek and Ransom Creek and installing flood gauges.

# 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.

The Consortium Towns are all experiencing housing shortages and overall they have an aging housing stock, so there is a concerted effort to improve existing housing units and to provide low and moderate income individuals and certain other populations with assistance to maintain their homes. Amherst will utilize HOME and CDBG resources to improve and maintain quality affordable housing stock through funding for maintenance and rehabilitation of (i) existing owner-occupied housing units, (ii) existing rental housing units, (iii) military veteran housing units, (iv) households in need of improvements for handicapped accessibility, and (v) weatherization assistance. Amherst, Cheektowaga and Tonawanda will utilize HOME funding to conduct owner-occupied home rehabilitation for houses that assess under HUD HOME value limits for funding assistance. To increase the supply of affordable housing the Consortium Communities will also provide HOME gap funding for private development of new affordable multi-family housing and Amherst will further support new affordable housing units through an accessory dwelling unit program with HOME funding.

Coming out of COVID-19 the Consortium communities are putting a heavy focus on partnering with providers of a host of public services to help ensure tenants rights are protected, victims of domestic violence have a safety net and support and safe transitional housing, seniors have transportation and access to food, youth have places to go and recreational opportunities after school and over the summer, and those impacted by the tightening housing market have protections to avoid being displaced.

Each Consortium community is focusing efforts on economic development and reducing blight in response to multiple trends and economic disruptors including of the Sumitomo Rubber plants closure in Tonawanda and the closure of the Boulevard Mall in Amherst. Amherst is addressing the economic impacts of the closure of the Boulevard Mall by looking at site-specific activities including infrastructure investments and place making possibilities, while also looking beyond the mall property and supporting small businesses and commercial property owners.

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

### Geographic Area

<b>1</b>	<b>Area Name:</b>	Egbertsville
	<b>Area Type:</b>	Local Target area
	<b>Revital Type:</b>	Housing. Public Infrastructure, Facilities, Public Services
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The Egbertsville target area lies between Niagara Falls Blvd. on the west, Eggert Road and Millersport Highway on the east, Main Street on the south and Sheridan Drive on the north.
	<b>Include specific housing and commercial characteristics of this target area.</b>	This area has an abundance of older homes and small businesses in the Town as it is the first ring of the suburb bordering the City of Buffalo. The south campus of the University of Buffalo sits at the southwest corner of the area near University Plaza and thus the neighborhood is home to many students. It is bordered by public transportation routes on all sides and is one of the main north south corridors in the Town leading to many employment centers. This area has a large low to moderate income population and is also very diverse.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The western portion of the Egbertsville area has a large number of subsidized apartments and older less expensive homes, making it attractive to lower income households as both renters and homeowners. The school system in Egbertsville is considered a high draw for LMI families, bringing a need for supportive programs for children and public safety to the city-adjacent neighborhood.

	<p><b>Identify the needs in this target area.</b></p>	<p>The older homes are in need of maintenance and many low-income homeowners do not have the resources to keep up with the maintenance. Youth services and crime prevention are also needed in this target area. Many of the commercial structures have suffered from a lack of investment and are in need of upgrades that improve the aesthetic appeal and economic climate. Significant improvements in aging public infrastructure are also needed to improve neighborhood reinvestment.</p>
	<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>The main focus in this area is housing affordability and sustainability. There is also a need for youth services, community policing, parks and public infrastructure investments, and investment within the business corridors.</p>
	<p><b>Are there barriers to improvement in this target area?</b></p>	<p>Out of town landlords are moving in and purchasing properties to displace families in favor of student rentals, which typically provide higher rents and ROI. Property upkeep declines when this happens and there are opportunities for housing discrimination.</p>
<p><b>2</b></p>	<p><b>Area Name:</b></p>	<p>Boulevard Central District/Opportunity Zone – Census Tract 92</p>
	<p><b>Area Type:</b></p>	<p>Local Target area</p>
	<p><b>Revital Type:</b></p>	
	<p><b>Other Revital Description:</b></p>	
	<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>The Boulevard Central District/Opportunity Zone encompasses Census Tract 92 and is bounded by Niagara Falls Boulevard to the west, Sheridan Drive to the south, and runs approximately along the I-290 corridor on the northeast.</p>
	<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>The target area consists of significant but vacating, big box retail along highly trafficked commercial corridors, with residential concentrations in the southwestern portion of the target area including a mix of owner-occupied single family and multi-family rental units (Delta Garden and Emerson Square) predominately constructed in the 1950s and 1960s.</p>

<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>The federal Opportunity Zone program identified Census Tract 92 as an Opportunity Zone based on information provided by New York State. The closure of the Boulevard mall has had significant negative impact and redevelopment options for the site are a focus for the Town. Infrastructure investments are imperative to leverage new economic and community development.</p>												
<p><b>Identify the needs in this target area.</b></p>	<p>Public infrastructure to support new commercial investment and employment and foster stable activity with associated housing.</p>												
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>The Opportunity Zone program provides opportunity for significant private investment in commercial activities, supporting residential structures, and new affordable residential in-fill development. There are large scale, and significant commercial and mixed-use opportunities along Niagara Falls Boulevard and Maple Road – most notably at the Boulevard mall site.</p>												
<p><b>Are there barriers to improvement in this target area?</b></p>	<p>The large-scale nature of the commercial operations will require significant private sector investment. Public improvements to support potential investment and to create green space and/or recreational opportunities, improve the aesthetic, address connectivity, and mitigate safety concerns created through new investment will be important.</p>												
<p><b>3</b></p>	<table border="1"> <tr> <td data-bbox="727 1232 992 1287"> <p><b>Area Name:</b></p> </td> <td data-bbox="992 1232 1430 1287"> <p>Creekside &amp; Willowridge Neighborhood</p> </td> </tr> <tr> <td data-bbox="727 1287 992 1341"> <p><b>Area Type:</b></p> </td> <td data-bbox="992 1287 1430 1341"> <p>Local Target Area</p> </td> </tr> <tr> <td data-bbox="727 1341 992 1396"> <p><b>Revital Type:</b></p> </td> <td data-bbox="992 1341 1430 1396"></td> </tr> <tr> <td data-bbox="727 1396 992 1451"> <p><b>Other Revital Description:</b></p> </td> <td data-bbox="992 1396 1430 1451"></td> </tr> <tr> <td data-bbox="727 1451 992 1591"> <p><b>Identify the neighborhood boundaries for this target area.</b></p> </td> <td data-bbox="992 1451 1430 1591"> <p>Creekside and Willowridge Neighborhoods are bounded by Niagara Falls Boulevard to the west, Interstate 290 to the south, and Sweet Home Road to the east.</p> </td> </tr> <tr> <td data-bbox="727 1591 992 1892"> <p><b>Include specific housing and commercial characteristics of this target area.</b></p> </td> <td data-bbox="992 1591 1430 1892"> <p>This neighborhood borders the Opportunity Zone and extends up to Tonawanda Creek Road. On the east side is Sweet Home Road, where there is a significant amount of commercial properties. There is also a large industrial and office complex off of Commerce Drive. The housing was built in the 1970's &amp; 1980's and there is a need for housing rehabilitation.</p> </td> </tr> </table>	<p><b>Area Name:</b></p>	<p>Creekside &amp; Willowridge Neighborhood</p>	<p><b>Area Type:</b></p>	<p>Local Target Area</p>	<p><b>Revital Type:</b></p>		<p><b>Other Revital Description:</b></p>		<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>Creekside and Willowridge Neighborhoods are bounded by Niagara Falls Boulevard to the west, Interstate 290 to the south, and Sweet Home Road to the east.</p>	<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>This neighborhood borders the Opportunity Zone and extends up to Tonawanda Creek Road. On the east side is Sweet Home Road, where there is a significant amount of commercial properties. There is also a large industrial and office complex off of Commerce Drive. The housing was built in the 1970's &amp; 1980's and there is a need for housing rehabilitation.</p>
<p><b>Area Name:</b></p>	<p>Creekside &amp; Willowridge Neighborhood</p>												
<p><b>Area Type:</b></p>	<p>Local Target Area</p>												
<p><b>Revital Type:</b></p>													
<p><b>Other Revital Description:</b></p>													
<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>Creekside and Willowridge Neighborhoods are bounded by Niagara Falls Boulevard to the west, Interstate 290 to the south, and Sweet Home Road to the east.</p>												
<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>This neighborhood borders the Opportunity Zone and extends up to Tonawanda Creek Road. On the east side is Sweet Home Road, where there is a significant amount of commercial properties. There is also a large industrial and office complex off of Commerce Drive. The housing was built in the 1970's &amp; 1980's and there is a need for housing rehabilitation.</p>												

	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	There are a number of rentals in this target area that may qualify for housing rehabilitation assistance if they are owner-occupied. The housing is between 40 & 50 years old and have lower income households.
	<b>Identify the needs in this target area.</b>	Housing repair assistance with accessibility improvements, new and improved playground and recreation facilities, trailway connections and community service programs hosted in Northwest Amherst Community Center.
	<b>What are the opportunities for improvement in this target area?</b>	Playground and park improvements to provide recreation opportunities for residents of all ages
	<b>Are there barriers to improvement in this target area?</b>	Accessibility assistance and trailway connections to public facilities are expensive
<b>4</b>	<b>Area Name:</b>	Town Wide
	<b>Area Type:</b>	Town Wide
	<b>Other Target Area Description:</b>	Town Wide
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	Amherst Town Wide is bordered by Niagara Falls Blvd. on the west, Transit Road on the east and Wehrle Drive on the south and Tonawanda Creek Road on the north.
	<b>Include specific housing and commercial characteristics of this target area.</b>	While many of the housing programs are concentrated in the older Eggertsville neighborhoods where the household income is more low to moderate, increasing aging populations throughout Town has translated to additional households becoming eligible through retirement and social security income while continuing to live in their homes. These homes are aging as well and many are in need of repair or accessibility assistance to offer aging in place.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	More seniors are requesting assistance that want to remain in their homes. While many of the homes in the neighborhoods east of Eggertsville may have a higher assessment, the owners are relying on retirement income.
	<b>Identify the needs in this target area.</b>	Mainly housing repair and assistance with accessibility.

	<b>What are the opportunities for improvement in this target area?</b>	Sustainability of the neighborhoods, the development of affordable units in areas outside existing R/ECAPS, and allowing senior residents to age in place.
	<b>Are there barriers to improvement in this target area?</b>	Some of the homes are assessed higher than the HOME limits and larger in size needing more expensive repairs.  Accessibility assistance is expensive as well.

**Table 64 - Geographic Priority Areas**

**General Allocation Priorities**

**Describe the basis for allocating investments geographically within the state**

The ACT Consortium comprises three communities; Amherst, Cheektowaga and Tonawanda. Each community has its own unique needs and priorities. This section will describe the geographic priorities of ACT Consortium members.

Town of Amherst Geographic Priorities

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. 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 the Town of Tonawanda and has a higher concentration 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.

Egbertsville is a southwestern neighborhood in Amherst, which traditionally hosts most of the lowest-income households and the most affordable housing available in Town. The median household income and median home value in Egbertsville is \$63,061 and \$158,100 respectively (ACS 2022 – 5yr).

In the Creekwoods and Willowridge neighborhoods in northwestern Amherst, also maintain lower incomes with closer to average home values creating housing cost-burden issues for residents. In the Creekwoods and Willowridge Target Area the median household income and median home value is \$70,483 and \$216,700 respectively (ACS 2022-5yr). For comparison, the median household income and median home value town-wide is \$87,280 and \$262,800 respectively (ACS 2022– 5yr).

Because of these conditions, a majority of targeted (Non-Town-wide) funds for community development are directed to Egbertsville and the Creekwoods/Willowridge areas, to help stabilize the neighborhoods; assist homebuyers with purchasing a home; rehabilitating dilapidated/vacant housing; and acquiring, rehabilitating and reselling single-family homes.

The Boulevard Central District/Opportunity Zone is a target of an extensive Urban Renewal effort by the Town of Amherst, precipitated by the decline of the Boulevard Mall and the neighborhood blight created by its loss. The Town is now also focusing significant attention and resources to Census Tract 92 in order to both (i) mitigate the economic damage done to the area by the closure of the Boulevard Mall, and (ii) create new opportunities for the community within the footprint of the mall. The Town's initiatives to support redevelopment priorities for the Boulevard Mall focus on enhancing public benefits and programming in the Boulevard Central District Target Area to create jobs, housing, and stimulate private investment through activities that can be supported through the use of federal funds, specifically:

- Transform the blighted property into a walkable, mixed-use urban center featuring commercial, residential, and green spaces with supportive public infrastructure to lay the groundwork for private investment to follow, including replacing deteriorated public infrastructure, expanding water and sewer capacity, and improving public greenspaces.
- Generate infill redevelopment through various public programming and incentives that will expand the tax base, attract new businesses, and provide employment opportunities.
- Create new affordable higher-density housing within the mixed-use center to complement commercial and recreational spaces, ensuring inclusivity for all socioeconomic groups.

#### Town of Cheektowaga Geographic Priorities

The Town of Cheektowaga will direct assistance to both specific areas of the Town and on a Town-wide basis. Housing rehabilitation funds are made available to income-eligible homeowners on a Town-wide basis, including the Village of Sloan and the Cheektowaga portion of the Village of Depew. Funds are allocated between the Town and Villages based on relative census data for populations in those locales.

While the housing rehabilitation program is available to any income eligible homeowner in the Town of Cheektowaga, grant funds from the NYS Affordable Housing Corporation allow us to focus on designated low-income neighborhoods and provide homeowners a combination of loan and grant funds that are completely forgiven after a certain period of time, for those that qualify.

Some public services such as housing and financial counseling and Summer Day Camp Financial Aid are available on a Town-wide basis, while others such as community policing are carried out in the designated low-mod areas of Town.

### Town of Tonawanda Geographic Priorities

The Town of Tonawanda prioritizes its CDBG funding mainly on neighborhood investments such as housing and public infrastructure. Reductions in funding have forced the Town to reduce the number of acquisitions and demolitions and to limit demolitions to health and safety concerns. The Town has been focusing on housing rehabilitation and targeted public infrastructure investments to retain value in its low- moderate income neighborhoods. Special public service activities that have been identified by the people in the neighborhoods as a high priority have remained funded such as the Youth Services Program, the Senior Van Transportation Program, and the Community Policing Program.

The Town has effectively used Emergency Solution Grant (ESG) funds and ESG-CV funds to combat homelessness. It is important that the Town receives a consistent allocation of ESG funds after the 2024 hiatus.

The Town provides 20% of its CDBG entitlement funding (net administrative, planning, counseling and weatherization) to activities within the Village of Kenmore.

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

### Priority Needs

1	<b>Priority Need Name</b>	Residential Rehabilitation-Owner-Occupied
	<b>Priority Level</b>	High
	<b>Population</b>	Low, Moderate, Large Families, Families with Children, Elderly
	<b>Geographic Areas Affected</b>	Eggertsville, Town Wide
	<b>Associated Goals</b>	Improve Housing Stock
	<b>Description</b>	The program will improve the housing stock through the rehabilitation of owner-occupied units to benefit low and moderate-income households. Upon completion, units will meet all housing codes and be lead-safe. Emergency repairs of existing units will be prioritized.
	<b>Basis for Relative Priority</b>	Improving the housing stock continues to be a high priority.
2	<b>Priority Need Name</b>	Residential Rehab-Owner-Occupied Military Grant
	<b>Priority Level</b>	High
	<b>Population</b>	Low, Moderate, Large Families, Families with Children, Elderly
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Improve Housing Stock
	<b>Description</b>	This grant of \$5,000 toward the rehabilitation assistance is in the form of a 0% loan, forgiven over a five-year period of residency. The rehabilitation will improve the housing stock of owner-occupied units to benefit low and moderate-income households. Upon completion, units will meet all housing codes and be lead-safe. Emergency repairs of existing units will be prioritized.
	<b>Basis for Relative Priority</b>	Improving the housing stock continues to be a high priority and the number of veterans needing assistance has increased in accordance with increase in the older population in the Town.
3	<b>Priority Need Name</b>	Handicapped Accessibility
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Improve Housing Stock

	<b>Description</b>	The Town will provide a 0% interest, deferred payment loan for residents to make accessibility modifications to their home. Improvements may include accessible bathroom, kitchen, doorway, or ingress/egress modifications.
	<b>Basis for Relative Priority</b>	The Town and Village demographics have shown a higher than average low-moderate income senior population that would rather age in place in their communities than move into a higher density living environment. Also, more wartime veterans are returning home with life altering injuries that need assistance in gaining independent living.
4	<b>Priority Need Name</b>	Residential Rehab-Owner occupied Rental
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Eggertsville, Town Wide
	<b>Associated Goals</b>	Improve Housing Stock
	<b>Description</b>	The Town and Village will offer Housing Rehabilitation assistance to Owner-occupied Rental properties to rehabilitate approximately 1-2 units of affordable rental housing in owner-occupied 2-unit structures.
	<b>Basis for Relative Priority</b>	Affordable rental housing is in high demand and both the Town and Village have many 2-unit structures that were built prior to 1960. Many of these units have not been maintained properly and are showing signs of deterioration.
5	<b>Priority Need Name</b>	Residential Rehab-Accessory Dwelling Units (ADUs)
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Generate New Affordable Housing
	<b>Description</b>	The Town and Village will offer assistance for technical support and the creation or renovation/rehabilitation of ADUs through an interest free loan program
	<b>Basis for Relative Priority</b>	Affordable housing is in high demand and both the Town and Village and there are many opportunities to either develop new or refurbish existing Accessory Dwelling Units.

6	<b>Priority Need Name</b>	New Affordable Multifamily Rental Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate, Middle, Elderly, Elderly, Persons with Physical Disabilities, Persons with Developmental Disabilities
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Generate New Affordable Housing
	<b>Description</b>	Construction of new affordable rental housing with a priority for, but not limited to elderly and/or disabled residents. . The Town of Amherst seeks to provide an incentive to non-profit and for-profit developers for the creation of new affordable rental housing units in town.
	<b>Basis for Relative Priority</b>	Stakeholders consistently cited the need for the creation of new affordable rental housing options as waiting lists are consistently over 100 persons. In addition, creating new affordable housing stock for seniors and persons with disabilities is a documented need in town.
7	<b>Priority Need Name</b>	New Affordable Single-family Housing
	<b>Priority Level</b>	Low
	<b>Population</b>	Low, Moderate
	<b>Geographic Areas Affected</b>	Town wide
	<b>Associated Goals</b>	Provide Affordable Homeownership
	<b>Description</b>	The Town will purchase vacant deteriorated property through mortgage or tax foreclosure, estate sale, short sale, or open market. The rehabilitation or new construction will return the property to acceptable conditions or better and make these properties affordable to a low-moderate-income first-time homebuyer.
	<b>Basis for Relative Priority</b>	Existing vacant properties in lower-income neighborhoods are becoming deteriorated due to the length of time they sit abandoned. Research into the current housing market shows very few homes for sale in the affordable level that LMI homebuyers can afford that are habitable. The Town has also formed a Distressed Property Task Force to address some of these abandoned property issues.
8	<b>Priority Need Name</b>	Homebuyer Assistance for Affordable Housing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low, Low, Moderate, Large Families, Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Provide Affordable Homeownership
	<b>Description</b>	The Town will provide up to \$50,000 in a combination of down-payment and closing cost assistance for first-time homebuyers. The Closing cost assistance portion is a 0% interest, deferred payment loan, while the down-payment assistance is forgiven over time.
	<b>Basis for Relative Priority</b>	The Town and Village have an increasingly unaffordable housing stock that limits access to housing options for first-time homebuyers. These grants/loans provide the catalyst for them to afford the purchase of their first home in high-opportunity areas.
<b>9</b>	<b>Priority Need Name</b>	Assist Victims of Domestic Violence
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Reduce Homelessness Risk
	<b>Description</b>	The Town provides CDBG resources to support Haven House’s assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless.
	<b>Basis for Relative Priority</b>	There has been a great need identified in the region for temporary housing and supportive services for those escaping domestic violence. Also, local call-volume trends indicate an increasing trend in domestic violence situations, possibly correlating to reduced housing affordability, which leave people in desperate situations to maintain a roof over their heads.
<b>10</b>	<b>Priority Need Name</b>	Housing Counseling & Foreclosure Prevention
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Reduce Homelessness Risk

	<b>Description</b>	The Town contracts with HUD-certified housing counseling agencies to provide one-on-one counseling with low-moderate income eligible residents with housing issues, credit/financial issues, apartment searches, tenant-landlord issues, etc. Belmont Housing Resources for WNY administers the Section 8 rental assistance program for all of Erie County (except for City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at risk of mortgage default or foreclosure.
	<b>Basis for Relative Priority</b>	American Community Survey statistics show that a segment of the Town’s residents experience financial stress that may lead to housing instability issues. A housing counselor assists these residents with budgeting, financing, and referrals for those experiencing risk of mortgage default. In addition, HUD accredited counseling and financial education is made available to eligible first-time homebuyers to prepare them for homeownership.
<b>11</b>	<b>Priority Need Name</b>	Weatherization Assistance
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Improve Housing Stock
	<b>Description</b>	The Town will contract with Supportive Services Corporation to provide energy assistance such as insulation, caulking, or newer energy-efficient appliances for income eligible Town and Village residents.
	<b>Basis for Relative Priority</b>	The Town and Village have approximately 23,000 housing units of which 80% were built prior to 1960. Many of these homes have deteriorated to the point of becoming energy inefficient.
<b>12</b>	<b>Priority Need Name</b>	Fair Housing Counseling
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Affirmatively Further Fair Housing

	<b>Description</b>	The Town has contracted with Housing Opportunities Made Equal (HOME), a Fair Housing Counseling and Enforcement Agency to educate, counsel and resolve complaints in the Town of unfair housing practices and discrimination in housing and employment. The agency also offers landlord-tenant education and mediates landlord tenant disputes. The Town’s Fair Housing Officer receives calls and complaints regarding perceived discrimination or unfair housing practices but does refer the complaint to the agency for resolution or legal assistance.
	<b>Basis for Relative Priority</b>	The Town has a large number of rental units both privately owned and investment property as well as many rental assistance units, senior and multi-family.
<b>13</b>	<b>Priority Need Name</b>	Historic Preservation
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low, Low, Moderate, Middle
	<b>Geographic Areas Affected</b>	Town Wide
	<b>Associated Goals</b>	Support Neighborhood Revitalization
	<b>Description</b>	The Town and Village are home to many historic structures, and many have been given landmark status. The Village will use a significant portion of their share of CDBG funding for the restoration of the Williamsville Meeting House and the Section House to preserve the Historic Landmarks. The projects will be considered under the Spot-basis for slum and blight designation.
	<b>Basis for Relative Priority</b>	Many of the existing historic buildings in the Village are in need of repair to maintain their viability.
<b>14</b>	<b>Priority Need Name</b>	Community Services
	<b>Priority Level</b>	Moderate
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Eggertsville, Creekwoods & Willowridge, Town Wide
	<b>Associated Goals</b>	Support Community Service Needs
	<b>Description</b>	Supportive programming for low and moderate income populations includes such needs as transportation assistance and meal services for seniors; youth afterschool programming; community policing; financial education and free legal assistance.

	<b>Basis for Relative Priority</b>	Through neighborhood planning efforts, residents have identified the need to provide additional programming for at-risk youth and provide a stronger presence of community support in a non-confrontational environment. Stakeholders in the health and human services fields also cited a need for increased senior transportation assistance for medical purposes and socialization, as well as affordable food service programming for seniors through Amherst Meals on Wheels.
15	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	Low
	<b>Population</b>	Low, Moderate
	<b>Geographic Areas Affected</b>	Eggertsville
	<b>Associated Goals</b>	Support Neighborhood Revitalization
	<b>Description</b>	CDBG funding can support small commercial building reinvestment via a Facade Improvement Program for businesses who hire a LMI person or serve a LMI neighborhood and public improvements can be made to enhance and leverage private investments in economic development.
	<b>Basis for Relative Priority</b>	Increased business vacancies, deterioration of small commercial buildings, and loss of retail jobs in Eggertsville have led to shrinking economic activity and quality of life in Racial/Ethnic Concentrated Areas of Poverty. Additionally, closure of the Boulevard Mall, and the designation of Census Tract 92 as a federal Opportunity Zone, showcase a need and opportunity for significant economic development support through strategic public investments. .
16	<b>Priority Need Name</b>	Public Facilities and Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low, Low, Moderate
	<b>Geographic Areas Affected</b>	Eggertsville, Creekwoods & Willowridge, Boulevard Central District/ Opportunity Zone, Town Wide
	<b>Associated Goals</b>	Support Neighborhood Revitalization

	<b>Description</b>	The Town will invest in public facilities and infrastructure in order to beautify, connect, and revitalize neighborhoods and support reinvestment. CDBG resources will be used to support newly created community centers, public youth and recreation facilities, sidewalk and trail improvements, public sewer and water investments, and streetscape beautification in CDBG block group neighborhoods.
	<b>Basis for Relative Priority</b>	Target Areas' neighborhood plans and the Town's comprehensive land use plan have identified the need to maintain neighborhood assets, improve infrastructure and community gathering places to revitalize low-income neighborhoods.

**Table 65 – Priority Needs Summary**

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

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	ACT Consortium Members will not utilize HOME funds for TBRA.
TBRA for Non-Homeless Special Needs	ACT Consortium Members will not utilize HOME funds for TBRA for Non-Homeless Special Needs.
New Unit Production	ACT Consortium members will use HOME funds for the development of new housing units, specifically through subsidies for new affordable multifamily rental housing, with a priority for units serving seniors and persons with disabilities. The Town of Amherst will utilize HOME to leverage larger affordable housing developments to mitigate the increasing funding gaps not-for-profit developers are encountering with affordable housing projects.
Rehabilitation	ACT Consortium members will continue to provide CDBG and HOME Program funding support for owner-occupied housing rehabilitation programs for households at or below 80% AMI in an effort to preserve affordable ownership opportunities. ACT Consortium members also offer rehabilitation assistance to owners of rental housing who rent to income-eligible tenants. Amherst will use CDBG and HOME funds to support a pilot program for the development or rehabilitation of Accessory Dwelling Units.
Acquisition, including preservation	ACT Consortium members will provide HOME funds for acquisition/rehab/resale of property to provide affordable housing for first-time homebuyers. Continually increasing costs have made the development of new affordable housing more difficult, requiring more leveraging than ever.

**Table 66 – Influence of Market Condition**

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

### Introduction

The Town of Amherst is expected to receive approximately \$640,000 in Community Development Block Grant funding for 2025, with roughly \$120,000 in program income received during the program year. The Amherst, Cheektowaga, Tonawanda (A-C-T) HOME Consortium will receive \$830,000 in 2025 HOME Investment Partnerships Grant funding, with an anticipated \$400,000 in program income.

### 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		\$120,000	0			CDBG
HOME	public - federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership		\$400,000	\$0			HOME

Table 67 - Anticipated Resources

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

The Town of Amherst implements HUD-funded programming to strategically leverage federal funding alongside state and local resources. Programs that commonly utilize HUD funding include the Home Energy Assistance Program for weatherization initiatives; NYS Affordable

Housing Corporation grants for homeowner rehabilitation and accessory dwelling unit projects; and various incentives for affordable multifamily rental rehabilitation or new development. The multifamily rental incentives include Low-Income Housing Tax Credits, local payment-in-lieu-of-taxes (PILOT) agreements, and support from the Amherst Industrial Development Corporation. Significant HOME-funding match resources are generated by the Town's Affordable Housing Corporation Grant and private investment into multi-family affordable housing development.

**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's Neighborhood Revitalization Working Group identifies dilapidated and vacant properties suitable for legal acquisition by the Town. When feasible, these properties may be repurposed for HUD-based programming. Currently, the Town is assessing the redevelopment potential of a former community center for housing initiatives and exploring the reduction of the public right-of-way in the Audubon neighborhood to facilitate in-fill development along newly created street frontages. In addition, the Town may seek Eminent Domain acquisition of the former Boulevard Mall properties where Urban Renewal efforts are currently being planned. Should public lands become available for redevelopment through these efforts, the Town will prioritize land reuse strategies that align with HUD objectives and the needs identified in the plan.

**Discussion**

As existing leveraging resources mentioned above are expended, the Consortium Towns and our program sub recipients will continue to seek new grant awards to supplement HUD funding to meet community needs.

## 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.

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Town of Amherst Community Development	Departments and agencies	Economic Development	Jurisdiction
Town of Amherst Senior Services	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Town of Amherst Youth and Recreation Department	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Belmont Housing Resources for WNY	Non-profit organization	Ownership, Rental	Region
Cheektowaga Township	Government	Ownership	Jurisdiction
Town of Tonawanda	Government	Ownership	Jurisdiction
New Opportunities Community Housing Development Corporation	Non-profit organization	Ownership	Jurisdiction
Housing Opportunities Made Equal	Non-profit organization	Rental	Region
Family Justice Center of Erie County	Non-profit organization	Non-homeless special needs, public services	
NYS Affordable Housing Corporation	Departments and agencies	Ownership	State
Child and Family Services	Non-profit organization	Non-homeless special needs, public services	Region
Buffalo Urban League	Non-profit organization	Non-homeless special needs, public services	Region
Erie County Supportive Services	Non-profit organization	Ownership, Rental	Jurisdiction
Lt. Matt Urban Center DBA Polish Community Center	Non-profit organizations	Homeless special needs	Region
Supportive Services of Western New York	Non-profit organizations	Ownership, Rental	Region

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
Town of Amherst Community Development	Departments and agencies	Economic Development	Jurisdiction
Town of Amherst Senior Services	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Town of Amherst Youth and Recreation Department	Departments and agencies	Non-homeless special needs, public services	Jurisdiction
Village of Williamsville	Government	Non-homeless special needs, neighborhood improvements, public services	Jurisdiction
University District Community Development Association	Non-profit organizations	Ownership, Rental	Jurisdiction

**Table 68- 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

The major gap that exists relates to community-based development organizations (CHDOs). The existing CHDOs have had difficulty satisfying the HUD requirements regarding development experience and organizational capacity. This has created a shortage of CHDOs within the Consortium area. This may require establishing new CHDOs or expanding the reference geographic point/priority area of existing ones.

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

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

**Table 69 - Homeless Prevention Services Summary**

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

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

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

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

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

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

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

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

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

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

These additional programs provide financial management intervention, counseling services, advice on budgeting and financial problems, and other life skills. The programs include: Parachute 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**

Persons who are homeless have access to the various elements of the Continuum of Care available throughout Erie County through a variety of means. The Homeless Alliance of WNY coordinates the provision of services through a five County region and is an active and involved partner in providing entry points to the Continuum of Care.

In addition, the Crisis Services Street Outreach Program reaches low-income persons on the street throughout the County and Consortium, as well as individuals frequenting area soup kitchens and food pantries in areas of Amherst, Cheektowaga and Tonawanda. This program has a primary focus on serving homeless persons who are mentally ill. 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 work together to identify the homeless, assess their needs, and refer them to the appropriate agency.

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	Improve Housing Stock	2025	2029	Affordable Housing	Egbertsville Creekwoods-Willowridge Boulevard Central District/Opp Zone Town-Wide	Handicapped Accessibility Residential Rehab-Owner occupied Rental Residential Rehab-Owner-Occupied Military Grant Residential Rehabilitation-Owner-Occupied	CDBG:  HOME:	Homeowner Housing Rehabilitated: 100 Household Housing Units  Rental units rehabilitated: 2 Household Housing Units  Weatherized Units: 50 Household Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Provide Affordable Homeownership	2025	2029	Affordable Housing	Town Wide	New Affordable Single-family Housing Homebuyer Assistance for Affordable Housing	CDBG:	Direct Financial Assistance to Homebuyers: 20 Households Assisted  Homeowner Housing Added: 2 Household Housing Unit
3	Generate New Affordable Housing	2025	2029	Affordable Housing	Boulevard Central District/Opp Zone  Town Wide	New Affordable Multifamily Housing  Residential Rehab-Accessory Dwelling Units	CDBG:  HOME:	New Rental Units Constructed: 8 Units
4	Support Community Service Needs	2025	2029	Non-Housing Community Development	Egbertsville Boulevard Central District/Opp Zone Creekwoods-Willowridge Town Wide	Public Services Transportation Assistance Meal Services Youth Programming Community Policing Financial Education Free Legal Assistance	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit: 300 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Reduce Homelessness Risk	2025	2029	Affordable Housing Homeless Non-Homeless Special Needs	Egbertsville Town Wide	Assist Victims of Domestic Violence Housing Counseling & Foreclosure Prevention Assistance	CDBG:	Homelessness Prevention: 700 Persons Assisted
6	Affirmatively Further Fair Housing	2025	2029	Affordable Housing Public Housing Non-Homeless Special Needs	Town Wide	Fair Housing Counseling	CDBG:	Public service activities for Low/Moderate Income Housing Benefit: 500 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Support Neighborhood Revitalization	2025	2029	Historic Preservation; Non-Housing Community Development	Town Wide Eggertsville Boulevard Central District/Opp Zone Creekwoods & Willowridge	Historic Preservation Public Facilities & Infrastructure Economic Development	CDBG:	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,000 Persons Assisted  Facade treatment/business building rehabilitation: 2 Business  Jobs created/retained: 2 Jobs

Table 70 - Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	<b>Improve Housing Stock</b>
	<b>Goal Description</b>	<p>The Consortium Towns’ housing stock is aging and certain populations require assistance to maintain their homes. Amherst will utilize CDBG resources to improve and maintain quality affordable housing stock through funding for maintenance and rehabilitation of (i) existing owner-occupied housing units, (ii) existing rental housing units, (iii) military veteran housing units, (iv) households in need of improvements for handicapped accessibility, and (v) weatherization assistance.</p> <p>Amherst, Cheektowaga and Tonawanda will utilize HOME funding to conduct owner-occupied home rehabilitation for houses that assess under HUD HOME value limits for funding assistance.</p>
2	<b>Goal Name</b>	<b>Provide Affordable Homeownership</b>
	<b>Goal Description</b>	<p>As housing values increase with limited housing stock for sale, homeownership can become out of reach for many low-income first-time homebuyers. Homeownership is important for lower income households to build wealth and economic stability. Amherst and Cheektowaga will facilitate home ownership by providing purchase assistance via HOME funding to first-time low-to-moderate income home buyers who purchase an existing house, or one provided for sale through the Acquisition – Rehab/New Construction - Resale Program.</p> <p>The Acquisition – Rehab/New Construction – Resale Program conducted by Amherst and Cheektowaga utilizes HOME funds to rehabilitation a vacant dilapidated home or construct a new unit on vacant land, which is then resold with a purchase subsidy in order to provide an affordable single-family home for sale to low-income buyers.</p> <p>These affordable homeownership opportunities will be made available to persons with incomes at or below 80% median income in the Towns of Cheektowaga, Amherst and Tonawanda.</p>
	<b>Goal Name</b>	<b>Generate New Affordable Housing</b>

3	<b>Goal Description</b>	<p>There is a significant need across the region to increase the supply of affordable housing. Amherst will generate new affordable housing units through programming aimed at generating accessory dwelling units and multifamily apartments. Utilizing HOME resources, the new ADU program will assist homeowners converting existing spaces in their principle dwelling into a new affordable unit for special populations or LMI households.</p> <p>Amherst, Cheektowaga and Tonawanda will provide a HOME-funded HOME Rental Subsidy Program to incentivize the development of new affordable multifamily apartment complexes or new rent-to-own single-family housing as part of the LIHTC-supported scattered site development model.</p>
4	<b>Goal Name</b>	<b>Support Community Service Needs</b>
	<b>Goal Description</b>	<p>Community services provide essential support to help vulnerable populations maintain self-sufficiency and financial stability. Amherst will utilize CDBG funding to provide public services aimed at supporting community service needs for low-to-moderate income populations and LMI neighborhoods, such as, but not limited to programming for transportation assistance, mental health needs, and meal services for seniors; youth and afterschool programming; community policing; financial education and free legal assistance.</p>
5	<b>Goal Name</b>	<b>Reduce Homelessness Risk</b>
	<b>Goal Description</b>	<p>Housing stability is essential to provide a secure foundation for overall well-being and success. Lack of secure housing impacts health, education, child development, workforce participation and economic outcomes. Amherst will provide assistance and counseling to families or individuals who have become homeless or are in imminent danger of becoming homeless to reduce these negative impacts. Amherst’s CDBG funding will be utilized to provide public services through Buffalo Urban League, Belmont Housing Resources for WNY, and Haven House to prevent homelessness of certain at-risk populations.</p> <p>Haven House works with victims of domestic violence in Amherst and the region and provides temporary housing and supportive service programming to help the women and their families to escape violence and become self-sufficient.</p> <p>Buffalo Urban League and Belmont Housing 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>

6	<b>Goal Name</b>	<b>Affirmatively Further Fair Housing</b>
	<b>Goal Description</b>	Fair housing practices are essential to ensure equal access to safe, affordable, and quality housing for all individuals and necessary to fostering inclusive communities. Amherst will utilize CDBG funds to provide 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.
7	<b>Goal Name</b>	<b>Support Neighborhood Revitalization</b>
	<b>Goal Description</b>	<p>Older neighborhoods require support to foster reinvestment and revitalization in order to preserve community character, boost economic growth, enhance quality-of-life, reduce blight, and encourage social equity. Amherst neighborhoods will be supported with CDBG investments in public facilities and infrastructure, including sidewalks; community centers and public buildings; playgrounds and recreation facilities; and public utilities. CDBG funding will be available to preserve historic sites and eliminate slum and blight in neighborhoods in the Town of Amherst and the Village of Williamsville as applicable.</p> <p>In the Village and Town, public facilities serving low-to-moderate income (LMI) areas to be supported include the Williamsville Youth and Family Center, the Northwest Amherst Community Center, and Amherst Senior Center. CDBG funds will reinvest in playground and trail connection improvements in the Creekwoods and Willowridge Target Areas; provide kitchen and accessibility upgrades to the Senior Center; conduct sidewalk improvements and construction of ADA sidewalk ramps in low- and moderate-income areas; boost small business success with façade improvements and streetscape beautification in distressed commercial corridors; and implement water and sewer improvements serving LMI areas.</p> <p>Most importantly, CDBG funding will be utilized to eliminate slum &amp; blight in and around the former Boulevard Mall that is currently bringing down surrounding property values and stymying area economic development. The Town will focus on infrastructure improvements such as water and sewer to support the creation of a new mixed-use neighborhood, and the development of a new community center in the heart of the Boulevard Central District Target Area.</p>

**Table 71 – Goal Descriptions**

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

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

There is no public housing in the Towns of Amherst and Cheektowaga. The Kenmore Housing Authority owns and operates two senior citizens housing developments, Kenmore Village Apartments and Theaters Apartments. The Kenmore PHA is the only public housing authority in Erie County outside of the City of Buffalo. The Authority's renovation/rehabilitation money comes directly from HUD through the Capital Fund Program (old CIAP). All units meet ADA standards. No further action needed.

There are five large affordable (subsidized) family housing complexes and eleven affordable senior housing complexes in the Town that have rental assistance through project specific vouchers and many individual rental units that are Housing Choice Voucher-approved.

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

The Kenmore Public Housing Authority maintains strong resident involvement through an "Authority/Tenant" management structure that has served the residents of its Kenmore Village Apartments or Theater Apartments over the years. Two tenants are elected by the elderly residents to serve on the Kenmore Housing Authority Board. Both apartment buildings have organizations established by the tenants who elect their own officers. Both tenant representatives serve as vital members of the overall 7-member Board of Commissioners who attend the scheduled monthly meetings and whereby an agenda is presented and policy issues are discussed and/or approved.

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

The Kenmore Housing Authority is not designated as a troubled agency. The Kenmore PHA was listed on the High Performer list distributed by HUD in 2022.

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

N/A - Kenmore Public Housing Authority maintains a "high-performer" status.

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

### **Barriers to Affordable Housing**

Erie County, The City of Buffalo and the Amherst/Cheektowaga/Tonawanda Consortium have completed an Analysis of Impediments to Fair Housing Choice that has identified public and private barriers to affordable housing, while tracking recent efforts to remove or eliminate the barriers and developed an action plan to further and expand upon those efforts.

As discussed in MA-40, there are public policy barriers to affordable housing and residential investment that can be addressed directly by Consortium members. In addition to public policy related issues, the Analysis of Impediments to Fair Housing Choice identified the following barriers within the Consortium:

- Homelessness
- Lack of Affordable Housing
- Public Impediments

Across Consortium communities, lack of available land suitable for multi-family housing along with local regulations which limited or impede the development of multi-family housing are the most common barriers to affordable housing.

Barriers to affordable housing in the Town of Amherst include a zoning ordinance which allows the development of single-family detached units within multi-family zones, the requirement for two parking spaces per unit which can make it burdensome to develop multi-unit structures, and lot coverage limits of 35-40 percent which limits development density and affordability.

The primary barrier to affordable housing in the Town of Cheektowaga are minimum lot size requirements which may increase the cost of new development as well as the requirement of two off-street parking spots per unit.

Finally, the Town of Tonawanda has very little land identified for higher density or multi-family development. This limits the opportunity for affordable housing development, especially with a 30,000 square foot minimum lot size for multi-family, a 35 percent lot coverage requirement, and large minimum square footage unit size requirements. These standards make developing units that are affordable for lower income residents very challenging.

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

The Analysis of Impediments to Fair Housing Choice tracked recent efforts to remove or eliminate the barriers to affordable housing and developed an action plan to further and expand upon those efforts.

CDBG and HOME funds are used in the Consortium for a range of services benefiting low-income residents. Services include home rehabilitation, lead remediation, blight eradication (through demolition or rehabilitation), first time homebuyer assistance, and other community services. Consortium members have an extensive outreach program to ensure compliance with affirmative marketing requirements for

CDBG and HOME funds. This includes using notices in local newspapers, website announcements, and information flyers provided to tenants and managers about HOME programming in the communities. CDBG and HOME funds are also being used to provide down payment assistance for low-income buyers and to build new housing available to first time and low-income buyers specifically.

The Analysis to Impediments Action Plan recommended the following to increase access to Affordable Housing and Fair Housing Choice within the Consortium:

- Encourage local jurisdictions to revise ordinances to allow mixed-use infill development, multi-family development, group homes, shelters, and other facilities where appropriate. *Note: Amherst has taken action in the spirit of this recommendation by rezoning several acres in the Boulevard/Central Business District/Opportunity Zone to high density , mixed-use districts with reduced parking requirements.*
- Support homeless service providers, especially through development of transitional and supportive housing, and expand assistance as funding is available. *Note: The Town has reached out to developers and service providers who provide transitional and supportive housing and found that they are reluctant to develop transitional units in suburban communities due to the lack of access to other supportive services and the resultant distant between sites that create case management challenges.*
- Provide outreach and education to residents to reduce NIMBY resistance to housing development, particularly multi-family and other affordable housing.
- Identify areas for infill and redevelopment to provide housing in proximity to employment, retail, and services.
- Continue to improve quality of life in R/ECAPs where high concentrations of affordable housing exist by investing HOME and CDBG funding in needed infrastructure and economic development projects to expand opportunities and by expanding rehabilitation assistance to allow homeowners to maintain their homes.
- Expand education and outreach to increase the geographic spread and supply of affordable housing options throughout the Consortium communities.

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

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

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

The Towns of Amherst and Cheektowaga do not receive any direct homelessness assistance (i.e. Emergency Solutions Grant program funding) but rely on assistance through the Homeless Alliance of WNY and Belmont Housing Resources for WNY's Section 8 Housing Choice Voucher program and emergency housing assistance. The Town of Tonawanda has historically received ESG program funding, however did not in 2024.

The Homeless Alliance of WNY (HAWNY) is the umbrella organization that coordinates funding, services and collaboration among area agencies and services for the homeless. HAWNY convenes regular meetings between the various agencies and advises the Towns within the Consortium on homeless issues and related outreach efforts.

In PY 2022 the Consortium published the HOME-ARP Allocation plan of \$3.4M special appropriation funding to address homelessness. The Consortium incorporated the HOME-ARP allocation plan projects into the Consolidated and PY2023 Annual Action Plans. The plan prioritizes the development of new affordable rental housing, with additional resources to fully fund project success through complementary supportive services and capacity building for non-profit developers and service providers.

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

Law enforcement is available to assist victims of domestic violence in emergency situations through the Town of Amherst Police Department Family Offense Squad.

The Town of Tonawanda, through the provision of ESG funds, is more directly involved in addressing emergency and traditional needs of homeless persons. Participants in the region's homeless planning strategies and homeless service agencies request funding through the ESG program. Town staff in the Office of Planning and Development have collaborated with all regional social service agencies and the Mobile Safety Net Team on solutions for homeless persons and have funded shelter operations (utilities, telephone, insurance, food, etc.) and shelter essential services (transportation tokens and case management) at Compass House and the YWCA utilizing ESG funds and ESG-CV funds.

### **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 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. The Homeless Alliance of WNY continues their efforts 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.

Furthermore, the CoC will continue to provide training opportunities throughout the year for providers to learn eligibility requirements and referral processes for non-cash benefits (ie. SNAP, Medicaid, etc.) Monthly meetings with Erie County Department of Social Services (DSS) staff and homeless providers will continue to be held to discuss and resolve issues that have been identified as barriers to accessing mainstream resources. Eligibility for non-cash benefits will be assessed through the Coordinated Entry system.

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

The Consortium towns all provide programs designed to keep residents in their homes. Weatherization assistance and both rental and owner residential rehabilitation programs often help with emergency repairs or to mitigate cost burdens for low and moderate income individuals who might be right on the edge of losing their ability to stay housed. Amherst has contracted for the provision of housing counseling activities to homebuyers, homeowners and renters. The counseling educates 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.

The Consortium communities each support housing counseling services provided through Belmont Housing Resources for WNY, Inc. and Buffalo Urban League to provide credit and mortgage default counseling and legal assistance for foreclosure prevention and loan modification for homeowners at risk of losing their homes through job loss, costly medical bills, etc.

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

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

Each of the Consortium Community Development Departments provide educational materials to the community and to applicants for housing -based programs that provide information on the danger of lead paint hazards and ways to minimize risk associated with them. Homeowners and first-time homebuyers throughout the Consortium are advised of the availability of testing for elevated levels of lead in the blood of children.

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

The Consortium towns, through the Community Development Departments screen properties receiving CDBG or HOME funds for rehabilitation. All contractors participating in the Towns' rehabilitation loan programs have been advised of the federal regulations and if lead paint is found to be present in a home, hired contractors are required to be certified for lead removal and remediation in housing rehabilitation projects through Community Development. This ensures the availability of qualified, trained and competitive rehabilitation contractors when lead paint is present. Lead risk assessment and clearance testing is required on rehabilitation projects where paint may be disturbed; an environmental firm is contracted (through an RFP process) to provide these services at the most competitive cost. Failed clearance tests require the contractor to go back and correct the situation prior to conducting another clearance test and getting their final payment.

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

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

The Citizen Participation process undertaken as a part of the Consortium's Consolidated Planning effort included meetings with representatives from a variety of regional agencies, health and human services providers, and a variety of other stakeholders working in fields that either overlap or directly deal with poverty-level families. The repeated message was that reducing poverty require a wholistic approach. The Consortium Communities have identified goals and priorities reflect a commitment to addressing poverty with a variety of policies and programs addressing issues of economic development, transportation to connect people to employment opportunities and vital services, affordable housing, public services (especially for at-risk populations) and reducing the risk of homelessness, such as housing counseling, foreclosure prevention, and fair housing counseling.

In addition, the Erie County Department of Social Services serves the Consortium communities and has multiple programs designed to reduce the number of people living below the poverty level including employment programs, welfare reform, educational programming, and family preservation initiatives. The Department relies heavily on direct contact with other agencies, many of which seek to find employment for Temporary Assistance (TA) recipients.

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

The Town of Amherst works with Belmont Housing Resources for WNY, Inc. and the Buffalo Urban League to provide counseling for those persons that are struggling with credit and housing issues. Belmont provides assistance with credit counseling, homebuyer workshops, and administers the Housing Choice Voucher (section 8) and VASH rental assistance programs for those in need. The Buffalo Urban League offers assistance in foreclosure counseling as well as the legal assistance needed in many cases. Local free or reduced-cost legal agencies such as Western New York Law Center, Legal Aid of Buffalo, and Neighborhood Legal Services also provide legal counseling and representation.

Each of the Towns have mechanisms to provide services that can be a part of the solution when combating poverty, including:

- Business assistance for companies that are creating or maintaining employment opportunities made available to low- and moderate-income individuals.
- Publication and outreach of job opportunities in the region.
- Educational opportunities including programming for students to earn their General Equivalency Diploma (GED).
- Housing programs for owners and renters to deal with costly repair and emergency situations.
- Programs to develop additional affordable housing.

Additionally, the Consortium communities jointly support the efforts of Belmont Housing Resources for WNY, Buffalo Urban League and Parachute Credit Counseling to provide those struggling with credit and housing issues, and organizations such as Legal Aid of Buffalo, Neighborhood Legal Services, and the Western New York Law Center to help with legal counseling and representation to protect tenant and homeowner rights.

## 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 Amherst monitors its Consortium subrecipients (Towns of Cheektowaga and Tonawanda), CDBG subrecipients, Public Housing Authority Administrator, and Housing Development Agencies according to HOME and CDBG regulations. The Town uses a combination of remote assessment/assistance and annual on-site review to conduct performance evaluations for each entity. Because monitoring of activities is conducted on an ongoing basis, there have been no significant issues that need to be resolved. Rather, community development staff works with program participants to “fine-tune” procedures to facilitate improvements in communication, coordination and management.

When programs provide opportunities for contractor hiring, the Town and its subrecipients make every effort to recruit minority businesses to submit proposals/bids. The Town’s Requests for Proposals are advertised in minority newspapers through the three minority newspapers in the area, the Panorama Hispano, The Buffalo Criterion and The Challenger. When the Town has a home for sale or a construction project proposed, sale ads, RFPs and bid packages are also advertised in the minority newspapers.