PROPOSED THIRD PROGRAM YEAR ACTION PLAN FY 2012

Community Development Block Grant Emergency Solutions Grant (Town of Tonawanda) and HOME Investment Partnership Grant (Amherst-Cheektowaga-Tonawanda Consortium)

April 1, 2012 - March 31, 2013
Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 3 Action Plan Executive Summary:

The Town of Tonawanda and the Village of Kenmore, NY are applying for funding from the U.S. Department of Housing and Urban Development for a 34th consecutive year. The Town is anticipating entitlement funding to be approximately $1.4M in Community Development Block Grant funds, $209,000 in HOME Investment Partnership Grant funds, and $130,000 in Emergency Solutions Grant funds for FY 2012. The amount of funding available to our municipalities this coming fiscal year is less in actual dollar value than it was in 1978! Furthermore, costs have increased over 347% since, according to the Bureau of Labor Statistics.

With a dollar that is almost 20% of its value in 1978, our accomplishments toward meeting housing and community development needs have fallen approximately 80% since the enactment of the Housing and Community Development Act of 1974. Thankfully, Congress has not completely abandoned that Act’s legislative intent to provide low to moderate income persons an opportunity to live in a suitable living environment, find a decent home, and have a job.

The Annual Action Plan for FY 2012 contains a number of projects and activities that will continue to address the needs of our low to moderate income population in both the Town and Village, but demand certainly outpaces supply of our available resources. We currently have approximately 413 families on a waiting list for the Town’s Home Repair Program. Each year we are able to address about 30-40 homes with our available resources through both CDBG and HOME.

After last year’s 15% budget cut to CDBG and this year’s proposed additional cut of 11% along with a 38% reduction in HOME funding, neighborhood revitalization projects involving acquisition, demolition, and new construction will slow to a crawl or cease completely. The Town will be unable to meet its commitment to families that have invested in their neighborhood’s future plans. When these programs began
in the mid 1990’s, there were more resources available to meet local goals and objectives. Neighborhood transformation takes decades of implementation and strong financial backing to achieve a shared community vision of what a suitable living environment can be. Nonetheless, during FY2012, the Town will be budgeting $170,000 for acquisition of 7 vacant and substandard housing units. We are also budgeting $160,000 for subsequent demolition and clearance activities in the Town’s 3 target areas of Sheridan-Parkside Village Courts, Kenilworth, and Old Town.

The Town is planning to construct 2 new single-family homes in the Sheridan-Parkside Neighborhood with $300,000 in NSP-1 funding from the NYS Housing Finance Agency. Another home will be constructed in the Old Town Neighborhood using HOME Investment Partnership Grant funds from the FY2011 budget. New Opportunities Community Housing Development Organization (CHoDO) will partner with the Town as developer of the properties. Although the costs of home construction have become burdensome in this economy, the Town remains committed to the 104 families that have invested in the future of their neighborhoods.

The Town will also continue its Freedom Program-Housing Accessibility Program that provides 0% interest, deferred payment loans to families needing accessibility modifications done to their homes. The Town assisted 2 households last year and the CD office has been receiving more calls seeking assistance. With an aging population and returning war veterans, we expect to address at least another 2-3 households this next year.

The Town will also continue funding its Community Policing Program, Youth Services Program, and Code Enforcement Programs even though services will have to be reduced due to the budget cuts and a federally mandated cap of 15% on public services funding. These programs have a direct impact on the communities they serve and have produced consistently positive results.

The Town’s Division of Forestry will continue to plant trees in our low-moderate income neighborhoods to continue the work leftover from the 2006 October Surprise Storm and to fill in any other areas that are barren. They consistently perform well ahead of schedule and under budget. They have taken additional initiative to partner with the Boys & Girls Club of the Northtowns with a tree farming program in Old Town in 2010.

Belmont Housing Resources for WNY will continue to assist Town and Village residents with housing and credit issues through their HUD certified housing counseling staff. Supportive Services Corporation will also provide free weatherization services to both Town and Village residents as they have in previous years.

The Town will also continue to fund the First-Time Homebuyer Program that provides a $7,500 0% interest, deferred payment loan for closing cost assistance and down payment assistance for those families purchasing their first home in the Town or Village. The Town intends to help 6 households purchase their first home during FY 2012.

The Village of Kenmore will continue funding its residential rehabilitation program and also will be addressing some deteriorated sidewalks in a low-moderate income
area during FY 2012. The project will focus on improving pedestrian accessibility to Theodore Roosevelt Elementary School.

The Town’s HPRP program (T-TAP) is nearing completion with over 600 persons served since September 2009. The current homeless assistance program provided by a partnership of Belmont Housing Resources, Neighborhood Legal Services, and the Homeless Alliance of WNY will most likely continue in a revised format to conform to the new Emergency Solutions Grant Program guidelines recently released by HUD. The Town will also continue to provide support to area homeless shelters who assist the Town’s runaway youth and victims of domestic violence during FY 2012.

**General Questions**

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

**Program Year 3 Action Plan General Questions response:**

The Town of Tonawanda has historically concentrated its CDBG & HOME funding into three Town neighborhood preservation districts and the Village of Kenmore. The neighborhoods of Sheridan-Parkside, Old Town, Kenilworth/Lincoln Park, and the Village of Kenmore all have higher concentrations of low-moderate income households and higher concentrations of minorities. Figure 1 shows the areas that are designated as low-moderate income areas from the 2000 Census. The 2005-2009 ACS data confirms these neighborhoods continue to be eligible for CDBG assistance and shows that 20 additional census block groups are also eligible, although HUD has yet to issue the official low and moderate income summary data (LMISD) for the most recent census.

**Sheridan-Parkside Village Courts Neighborhood:**
This neighborhood is a 140-acre, 1,200 housing unit development built by the federal government to aid war-time workers and veterans returning from World War II. The multi-family units were constructed from 1940-1945. The housing units are configured as duplex, four-plex and six-plex apartment buildings. A small number of duplexes have been converted into single-family houses. In this Neighborhood Revitalization District, the 2000 Census data shows that 79.23% of its residents have a low to moderate-income. There are 409 minorities, the highest concentration in any town neighborhood outside of the Village of Kenmore. Also, there are 634 female head of households, which also represents the highest concentration in the town.

Out of the 950 housing units remaining, approximately 250 units are substandard, not suitable for rehabilitation and cannot be occupied. Of the remaining units, if maintenance continues to be neglected, a substantial number of those units will also become substandard, not suitable for rehabilitation and uninhabitable. According to the September 2010 quarterly data from the USPS and HUD, the vacancy rate was approximately 12.5%. The vacancy rate has increased about 1% since September 2008 and is much too high for a healthy neighborhood.

FY 2012 Action Items:

- **Acquisition/Demolition** - The Town will continue to focus on the acquisition and demolition of the four and six-unit residential structures that are substandard and not suitable for rehabilitation through an "arms-length" transaction. It will also purchase substandard two-unit residences when they become available. Eminent domain will not be used to acquire multi-family residences.

- **Public Services** - The Town will continue the reduction of crime through the Community Policing Program, the reduction of housing code violations through a systematic Code Enforcement Program, and providing positive recreational programming for the neighborhood’s youth through the Prime-Time Program.

- **H.O.P.E. Program** - During fiscal year 2012, the town will continue its Home Ownership for Parkside’s Enhancement (H.O.P.E.) Program. Two additional single-family homes will be constructed along Browning Avenue that will fill in an area that has been vacant for over 4 years. Also, some building lots may be sold to home builders to construct market rate housing for families and households who are between 80% -120% of HUD’s area median income. Each year that new houses are built leads to incremental improvements and stabilization of the Sheridan Parkside Village Courts Neighborhood.

All programs and projects operating within the Sheridan Parkside Neighborhood are working toward achieving the goals and objectives listed in the Sheridan Parkside Redevelopment Plan that was completed in 2003.

CDBG Funds allocated: Approximately 25% of CDBG funds for neighborhood activities will be spent in the Sheridan Parkside Village Courts during FY2012.

Old Town Neighborhood:
The 9 street blocks of the Old Town neighborhood were developed at the turn of the 1900's and provided housing for families that worked for the Erie Canal, Wick-Wire, Western Electric, etc. The area contains about 65 acres and has about 400 living units, of which about 15% are not suitable for rehabilitation and can be considered uninhabitable. There are approximately 170 rental units and 180 owner-occupied units.

The 2000 Census shows that this Neighborhood Revitalization District has 46.4% of its families at the low to moderate-income level. There are also 51 minorities, a high concentration when compared to other town neighborhoods. There are also 150 female head of households, which is an elevated rate for the Town. According to the September 2010 Quarterly Vacancy Data provided by the USPS, the vacancy rate has been slowly increasing over the last 3 years to approximately 9%.

A Neighborhood Redevelopment Plan has been prepared by the community to address the needs of the immediate neighborhood. The Town will continue to address any structures that become neglected through deferred maintenance. The community strongly supports the existing public services it receives through the Town’s Police, Highway, and Water Departments. They also would like to see several investments in public infrastructure and facilities over the next 10-15 years.

FY 2012 Action Items:

- **Acquisition/Demolition** - The Town will continue to acquire properties that can be considered substandard through a voluntary "arms-length" transaction. Eminent domain will not be used to purchase properties. The Town will be using infill construction of new single-family homes for income-qualified first-time homeowners on the lots that are cleared of the blighted housing. During FY 2012, the Town intends on acquiring about 5 substandard, uninhabitable dwelling units. The Town will subsequently demolish the structures in the Fall of 2012.

- **Code Enforcement** - Code enforcement will continue on an ongoing basis in 2012. Several residents have expressed a concern about a lack of maintenance on certain absentee-owner properties throughout the neighborhood.

- **Public Services** - The residents will have housing counseling and weatherization programs available to them. Community policing will be offered in Old Town to reduce vandalism, drug activity and increase a sense of neighborhood safety.

CDBG funds being allocated: 10% of CDBG funds are being allocated for Old Town neighborhood activities.

**Kenilworth/Lincoln Park Neighborhood:**

This is the largest and most populous of the low-moderate income neighborhoods in Tonawanda. The current vacancy rate is 3.2% which has doubled since last year and is somewhat higher than the 3.0% healthy housing market rate. The 2000 Census data shows that this Neighborhood Revitalization District has 43.7% of its families at the low-to-moderate income level. The population contains 86 minorities, a high concentration compared to other town neighborhoods, as well as 168 female head of households.
There are still about 20 housing units that can be considered substandard and may be acquired for future redevelopment if they become available. The Town will not use eminent domain in the process of acquiring these units.

Code enforcement concerns remain an issue within the area immediately surrounding Lincoln Park. The area has many rental units that are neglected by the absentee building owners. Further efforts will be made in 2012 to address this concern.

FY 2012 Action Items:

- **Acquisition/Demolition**: The Town will continue to acquire substandard, uninhabitable properties that remain in Kenilworth and Lincoln Park. During FY 2012 the town intends on acquiring 1 unit of dilapidated housing and subsequently demolishing the structure in the Fall of 2012.

- **Public Services**: The Town will continue the Community Policing Program which has shown to be effective at reducing criminal activity. The neighborhood watch program has become an engine for resident activity and interaction. The Town also offers weatherization services and housing counseling to the residents.

- **Code Enforcement**: The Town will continue to enforce its land use regulations regarding property maintenance, especially against the absentee landlords that allow eyesores to persist in the neighborhood.

CDBG funds being allocated: Approximately 10% of CDBG funds will be spent on Kenilworth/Lincoln Park neighborhood activities in FY 2012.

The Village of Kenmore:

The 1.5 square mile Village of Kenmore has generally aged gracefully and has been able to maintain viable neighborhoods. In the past, the Village augmented its street and waterline reconstruction with CDBG funds and has been successful in maintaining highway standards on a majority of the streets. The 2000 census shows that the HUD eligible block groups have 45% of its families at the low to moderate-income level. Also, the population data shows a composition of 129 minorities and 700 female head of households in the eligible block groups.

The Village will be continuing its Community Development objectives that include a Code Enforcement Program, Home Repair Program, Street Repair and the Village Community Policing Program.

FY 2012 Action Items:

- **Residential Rehabilitation**: The Village will continue its residential rehabilitation program through FY 2012. They intend to serve at least 4 low-moderate income single-family homeowners with repairs and 1 multi-unit homeowner with repairs.

- **Code Enforcement**: The Village Building Department will concentrate code enforcement actions in low-moderate income neighborhoods to improve overall living conditions.

- **Community Policing**: The Village Police Department will continue to implement its successful community policing program including the Neighborhood Watch Program and the Kenmore Citizen’s Training Academy. Increased patrols in the low-moderate income neighborhoods has shown to decrease overall crime events and increase interaction between neighbors and the Police Department.
CDBG funds being allocated: Approximately 20% of CDBG funds will be spent in the Village of Kenmore during FY2012.

Townwide (including the Village) activities targeted toward low-moderate income persons:

Town of Tonawanda neighborhoods were primarily built-up in the 1950’s through the mid 1960’s. The Village of Kenmore neighborhoods were primarily built-up in the 1930’s and 1940’s. The housing stock and the infrastructure of both municipalities are aging. However, there is more need in the neighborhoods directly adjacent to the City of Buffalo. Houses that are in the greatest need of repair are those whose conditions have severely deteriorated due to the owner’s neglect. Many houses that have the greatest need of repair are either owned by the elderly or by low to moderate-income families.

The revitalization goal of both municipalities is to provide affordable CDBG financing to low to moderate-income homeowner families and households to make home repairs that impact the health and safety of the occupants. There is an overwhelming need due to the large quantity of older homes in the town and village, the Residential Rehabilitation Loan Program waiting list has a significant number of households looking for assistance (385 families as of 11/04/11).

FY 2012 Action Items:

- **Residential Rehabilitation-** Status: Ongoing. This long-term objective will provide a 0% interest, deferred-payment loan to income-qualified homeowner families and households to make home repairs. This objective will assist in preserving neighborhoods through rehabilitation. Outcomes: Between 2005-2009, 124 single-units and 20 multi-units in the Town of Tonawanda were rehabilitated. In 2012, it is estimated that the Town will assist 25 single-units and 3 multi-units. The Village will assist 4 single-units and 1 multi-unit dwelling.

- **Emergency Rehabilitation-** Status: Ongoing. This short-term objective is to provide a 0% interest, deferred payment loan to homeowner families and households on the emergency priority list to make home repairs that may be a threat to their safety and health. Outcomes: Between 2005-2009, 67 units received emergency repairs.

- **Weatherization/Housing Counseling-** Status: Ongoing. These long-term objectives address the weatherization and housing counseling needs for both town and village residents. The programs are administered by Supportive Services Corporation and Belmont Housing Resources of WNY respectively. These programs are available every year the Town recieves CDBG funds. Outcomes: Between 2005-2009, 188 units were weatherized in the Town of Tonawanda and 176 residents received housing counseling. In 2012, it is anticipated that 41 families will receive weatherization services and 80 families will receive housing counseling.
The Town of Tonawanda is anticipating receiving an Emergency Solutions Grant (ESG) through the HEARTH Act. During FY 2011, the ESG grant amount was $83,487 for part I and an additional $46,961 was made available for part II funding for FY 2011 using the new Emergency Solutions Grant final rule requirements. The Town has sent a request for competitive proposals from emergency shelter providers for the FY2012 ESG funds. The Town has identified runaway youth and victims of domestic violence as those most in need in the Town and Village of Kenmore.

The Town will also be receiving $300,000 in Neighborhood Stabilization Program (NSP) funds from the NYS Housing Finance Agency that will be used for further revitilization efforts in the Sheridan Parkside Neighborhood. The $300,000 will cover the cost of constructing 2 new homes for the Town’s first-time homebuyer program. Already, the Town had used $198,000 of NSP funds to acquire an additional 18 abandoned and foreclosed substandard units within the neighborhood.

The Town has also received a Homelessness Prevention and Rapid Re-Housing Program (HPRP) grant through the American Recovery and Reinvestment Act (ARRA) of 2009 that has help prevent homelessness for over 600 individuals. The Town has partnered with Belmont Housing Resources of WNY, Neighborhood Legal Services, and the Homeless Alliance of WNY to help meet the goals of the program. The Town has expended $697,151 of a total of $772,574 to assist those families who are either experiencing homelessness or who are at risk of becoming homeless.

The Town has also received a CDBG-R award through the ARRA of $505,121. This much needed boost to the funding levels of our CDBG program will be used mainly for additional owner-occupied rehabilitation activities. Some funds have already been used for clearance of an abandoned office building and a 5 million gallon petroleum storage tank along River Road, the reconstruction of Lincoln Boulevard in the Village of Kenmore, and an environmental investigation of about 80 acres of former brownfield area along the waterfront for future economic development activity.

The Town of Tonawanda is not expecting to receive any additional funding for Community Development related projects in FY 2012.

It is anticipated that 100% of CDBG funds will be allocated to benefit low-to-moderate income areas and households during the 2012 Community Development program year.

Managing the Process

1. **Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.**

2. **Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.**

3. **Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.**
Program Year 3 Action Plan Managing the Process response:

The Town of Tonawanda Office of Community Development acts as the lead agency responsible for administering the HUD programs covered under the consolidated plan. The Village of Kenmore enters into a 3-year cooperative agreement with the Town in order to receive the federal CDBG and HOME funds. The Village also enters into a subrecipient agreement with the Town for specialized services.

The following subrecipients will enter into a subrecipient agreement for the use of CDBG, HOME, and ESG funds in FY 2012:

- Village of Kenmore – Community development programs.
- Belmont Housing Resources for WNY – Housing counseling.
- Supportive Services Corporation – Weatherization of housing units.
- New Opportunities Community Housing Development Organization (CHoDO) for the construction of new homes and other potential housing rehab projects.
- Compass House – Emergency shelter and services for homeless youth.
- The Franciscan Center – Emergency shelter and services for homeless youth.
- The Salvation Army – Emergency shelter improvements.

The 5-year Consolidated Plan was developed with input from a variety of agencies that are all working toward the betterment of the quality of life for people in Western New York. The following agencies were involved with the development of the plan:

- Erie County Department of Mental Health
- Erie County Department of Social Services
- Western NY Developmental Disabilities Service Office
- Benedict House
- Independent Living Center
- Homeless Alliance of Western New York
- Olmsted Center for the Visually Impaired
- Erie County Office of the Disabled
- Kenmore Public Housing Authority
- NYS Division of Housing and Community Renewal
- Belmont Shelter Corporation
- Erie County Department of Environment & Planning
- Erie County Health Department

The public was also provided with an opportunity to give their input on the development of the Consolidated Plan.

The Town will be coordinating with a variety of subrecipients regarding the Community Development Programs listed in this action plan as well as two ongoing temporary programs that were created under the American Recovery and Reinvestment Act of 2009 (ARRA). The Town has been extensively monitoring and overseeing the administration of the Homeless Prevention and Rapid Re-Housing Program (HPRP) as well as the Neighborhood Stabilization Program (NSP). These programs require an elevated level of communications between organizations responsible for delivering services to potential clients. The Town has prepared an administration plan to effectively carry out the goals of both programs.
The Town will also continue to implement its ESG administrative plan which advises social service and health agencies within the Town of Tonawanda about the benefits of the Town’s ESG subrecipient programs.

**Citizen Participation**

1. **Provide a summary of the citizen participation process.**

2. **Provide a summary of citizen comments or views on the plan.**

3. **Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.**

4. **Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.**

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

**Program Year 3 Action Plan Citizen Participation response:**

The citizen participation process began with the publication of a legal notice in the Ken-Ton Bee on September 20, 2011 and the Metro Source Community News on September 24, 2011 seeking citizen input on community development and housing needs. The public display advertisement was posted on the Sheridan Parkside Village Message Board requesting that, over a 30-day period (ending November 12th, 2011); the public submit their comments on the community and housing needs of the town including the Village of Kenmore and to comment on the town's past year CDBG, ESG, and HOME performance.

A public hearing notice was published in the above mentioned newspapers and was held at the Parkside Village Community Building in Sheridan Parkside on October 13, 2011 to answer citizen questions and receive ideas on the community's needs from town residents. The 5-year Consolidated Plan and the annual Performance Report (CAPER) were explained at the public hearing and made available for review.

Interested citizens and the Town of Tonawanda Department Heads were requested to submit their comments on the town’s community development and housing needs. Emergency shelters were mailed a request for proposals inviting them to submit a proposal regarding the Town of Tonawanda Emergency Solutions Grant funds. Four agencies responded with requests for CDBG funding and three agencies responded with ESG requests. In order to implement the Faith Based Initiative, a letter was sent out to 33 churches and parishes in the Town of Tonawanda and Village of Kenmore outlining the town's grants and requesting input on the needs of the town that are or can be addressed by faith-based organizations and what town resources would assist the faith-based organizations.

Draft copies of this fiscal year 2012 Annual Action Plan were distributed to the libraries in the Town of Tonawanda and Village of Kenmore, the Town's Community Development Office, the Village Clerk's Office, the Town Clerk's Office, and the Town Boys & Girls Club on December 21, 2011. The 2012 Annual Action Plan is also available through the Town’s web site: www.tonawanda.ny.us.
The public comment period for the draft will end on January 25, 2012. A second public hearing was held on January 12, 2012 to hear any comments or suggestions to the 5-Year Consolidated Plan and the Third Year 2012 Action Plan. Notice of locations and accessibility of the DRAFT 2012 Annual Action Plan was published in the Ken-Ton Bee and Metro Community News. The plan was also made available through the town’s website: www.tonawanda.ny.us. Written comments were requested of residents on the 2012 DRAFT Annual Action Plan asking that any comments be sent to the Town of Tonawanda Community Development Office at Parkside Village Community Building, 169 Sheridan Parkside Drive, Tonawanda, New York 14150.

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 our office located at the Community Center or via email. The CD office also held public meetings on the Old Town Redevelopment Plan on February 26, 2009 and June 30, 2009 at the Town Boys & Girls Club. They also held a public informational meeting on the Sheridan-Parkside Redevelopment Plan on August 30, 2010 in the Sheridan Parkside Community Center. The public comment period for the annual action plan began December 21, 2011 and ended January 23, 2012.

Appearing below is a summary of the questions taken at the Sheridan Parkside Community Center on Thursday, October 13, 2011 and January 12, 2012. A total of six residents attended the public meetings to offer their comments or questions. The Office of Community Development (CD) responses follow:

- **Why are you continuing to build subsidized housing in this neighborhood (Sheridan-Parkside) when it is continuing to go deteriorate?**

  The Town prepared a neighborhood revitalization strategy for the Sheridan Parkside Village Courts Neighborhood in 2003 that outlines broad redevelopment objectives of reducing the overall density of the neighborhood by eliminating blight and at the same time provides quality affordable housing choices for low-moderate income families. It is true that the neighborhood is dealing with a high vacancy rate (12.5%), but there has also been a commitment from the Town to the 34 families that have built new single-family homes in the neighborhood that the redevelopment will continue.

- **My neighbor does not care about controlling his child’s behavior. He is always trespassing on my property. How do I deal with that?**

  The Town’s Police Department can help with the trespassing issue.

Additional public comments will be published here in the final plan.

**Institutional Structure**

1. **Describe actions that will take place during the next year to develop institutional structure.**
Program Year 3 Action Plan Institutional Structure response:

New York State and Erie County have an excellent network of service agencies that are able to provide an impressive array of much needed supportive services for housing. In its communications with service agencies regarding the existence of gaps in the institutional structure for providing supportive services for housing, the general consensus discovered by Community Development staff was that there are no apparent gaps and that the existing matrix of agencies is well equipped to deal with the client base either through in-house resources or through referrals and networking with other existing social service agencies.

The most common need expressed was for direct housing assistance through Section 8 Vouchers and Certificates. Most agencies agree that the need or demand for services has outpaced available resources at an increasing rate over the last 10 years of service.

MUNICIPAL AGENCIES:

Town of Tonawanda Agencies:
- Town of Tonawanda Youth, Parks & Recreation Department- Administers the Prime Time Recreation Program, which is funded by the Town of Tonawanda, Erie County, and with CDBG funds. The program serves as an after-school Youth Enrichment Program for children ages 5-18 in the Sheridan Parkside Village neighborhood.
- Town of Tonawanda Police Department- Provides the Community Policing Program.
- Town of Tonawanda Highway Department- Rehabilitates and reconstructs streets, installs curbs, plants trees and removes dead trees.
- Town of Tonawanda Technical Support Department- Prepares bid documents for projects, and assists with inspection of public improvement projects.
- Town of Tonawanda Building Department- Assists with code enforcement.
- Town of Tonawanda Water Resources- Provides treatment of water and wastewater as well as waterline and sewer line replacement.
- Town of Tonawanda Development Corporation- Administers what remains of the Empire Zone program and assists with the development of private commerce center parks.
- Town of Tonawanda Assessor’s Department- Reviews the appraisals prepared by the CD appraisal consultant.
- Town of Tonawanda Department of Community Development- The Town’s Community Development Block Grant, Emergency Shelter Grant and federal HOME Investment Partnership funds are administered and managed by the Town’s Community Development Office. Staff have proven to have the ability to implement programs and activities in a professional and timely manner for the past thirty-two years. Focus will continue on the prevention and amelioration of identified needs in low-to-moderate income neighborhoods, owner and renter housing, and assistance with emergency shelters. The CD office will continue to collaborate with its traditional subrecipient partners while investigating better ways to serve the interests of those low to moderate income people in need.

The Village of Kenmore:
The Town of Tonawanda enters into a subrecipient agreement with the Village of Kenmore each year for their CDBG funded annual activities and a cooperation agreement every three years which allows the Town of Tonawanda to apply for and receive an entitlement CDBG grant that provided funds for programs which will prevent or ameliorate the deterioration of low-income village neighborhoods through infrastructure, curbs, sidewalks, trees, etc., as required, and low income village owner and renter housing. The Village carries out its own CDBG activities with technical assistance from the Town of Tonawanda Community Development staff.

PUBLIC AGENCIES:

The Kenmore Public Housing Authority:
Within the Town of Tonawanda, the Kenmore Public Housing Authority (PHA) has 200 units of Public Housing of which 100 units were constructed under the Section 23 Program of the Public Housing Law and with 100 units constructed under the Conventional Public Housing Program. Two hundred low-income households reside in these units. As necessary, the Kenmore PHA will assess the PHA apartment's physical building needs and then, as necessary, apply for funds under the Capital Fund Program (formerly the Comprehensive Improvement Assistance Program, CIAP) to upgrade/modernize the physical condition of their existing public housing. Also, new rental housing would be applied for by the Kenmore Public Housing Authority through the conventional public housing program for additional units. Additionally, the Kenmore PHA does have ten Section 8 vouchers that assist families to find affordable rental housing.

Erie County PHA Consortium:
It is comprised of 42 municipalities in Erie County outside the City of Buffalo. Although it was organized by the Erie County Division of Planning for the sole purpose of making the Section 8 rent subsidy program accessible to County residents, the County does not participate as a member of the PHA. The Town of Amherst agreed to be the PHA's lead agency. It has contracted with other municipalities of the PHA Consortium to act as the PHA's lead agency for the purpose of submitting grant applications and entering into contracts with HUD on behalf of the PHA Consortium. The Town of Amherst also contracts with Belmont Housing Resources of WNY on behalf of the Consortium to act as its management agent and with Erie County Division of Senior Services for the service component of the Hope for Elderly Independence program. The PHA Consortium does not have a board of commissioners or any paid staff. Member municipalities, which are entitlement communities under the Community Development Block Grant program, have a seat on the Consortium's Steering Committee. Erie County Division of Planning, which administers the CDBG program for the Erie County Community Development ("Urban County") Consortium (i.e., all communities that are not "Metropolitan Cities" in Erie County), also has a seat on the Steering Committee as a representative of the CD Consortium municipalities.

New York State Office of Persons with Developmental Disabilities: The office funds the acquisition of suitable housing and its rehabilitation in order to function as community residences in a neighborhood setting for developmentally disabled adults. Under New York State Mental Health law, these residences are treated as single-family homes. West Seneca Developmental Center is utilizing this funding to establish residences throughout the Consortium towns. The Consortium towns have contracted with West Seneca Developmental Center to utilize the funding provided for these residences as a match for its HOME program.
The New York State Labor Department:
The Labor Department does job training and testing for companies in the Town of Tonawanda periodically in the Sheridan Parkside Community Building.

NONPROFIT ORGANIZATIONS:

Supportive Services, Inc.: The Town of Tonawanda contracts with Supportive Services each year to provide weatherization services for income-qualified owner and renter units occupied by low-income households. The weatherization work is funded by the New York State Division of Housing and Community Renewal through the Weatherization Program.

Belmont Housing Resources for WNY:
The Town of Amherst, as the lead PHA for the Erie County Public Housing Agency Consortium, contracts with Belmont Shelter Corporation to administer the Section 8 Existing Housing Program. Low income persons are thus able to receive Section 8 certificates and vouchers through Belmont. Also, Belmont administers a Section 8 Project Based Program in the Consortium Towns. The PHA Consortium is participating in the Hope For Elderly Independence Demonstration Program to benefit low-income frail elderly renters in Erie County. The Town of Amherst, as lead PHA for the Consortium, has contracted with Erie County Department of Senior Services to administer the service component for the program.

Through Belmont Housing Resources of WNY the PHA Consortium and the Buffalo Veterans Administration Hospital have received funding to assist disabled homeless veterans. Belmont will administer the Section 8 rental assistance and the Veterans Hospital will administer the service component for this program. The HOME Consortium Towns of Amherst, Cheektowaga, and Tonawanda will contract individually with Belmont to provide comprehensive housing counseling services to owner and renter low-income households.

The Town has also contracted Belmont Housing Resources of WNY to administer the Town’s HPRP program known locally as the Tonawanda Temporary Assistance Program (T-TAP). This program has already assisted over 400 individuals with rental assistance or utility payments and will be operational for about another year, until the funds are depleted.

Holy Cross Head Start Program:
A Head Start Program for pre-school children in the Sheridan Parkside neighborhood is conducted by Holy Cross Head Start. It also conducts a bi-annual G.E.D.class for parents who have children in the Head Start Program, for residents of the Sheridan Parkside Village Neighborhood and any person who is in need of a G.E.D.

New Opportunities Community Housing Development Organization:
The Amherst-Cheektowaga-Tonawanda (ACT) HOME Consortium has selected New Opportunities as its CHODO to carry out the construction of new housing in the Sheridan Parkside Village, Kenilworth, Lincoln Park and Old Town neighborhoods and on a spot basis throughout the Town of Tonawanda utilizing funds from the HOME Investment Partnership Program. It conducts the Town’s Home Opener Program (H.O.P.) providing housing mortgage counseling and credit repair assistance associated with qualifying for the home ownership program.
Non-Profit Agencies:
The Town will continue to support non-profit housing agencies that apply to the Department of Housing and Urban Development for funds under the Supportive Housing for the Elderly Program or the Section 8 New Construction Program for the Elderly and the New York State financed HOPE/Enriched Housing Program for the Elderly.

Neighborhood Legal Services:
The Town has contracted Neighborhood Legal Services, Inc. (NLS) to assist clients in the Tonawanda Temporary Assistance Program with legal aid to help prevent homelessness. They are also assisting clients with obtaining other public benefits that they are entitled.

EMERGENCY SHELTER/SERVICE PROVIDERS:
Compass House, The Franciscan Center, Family Promise of WNY:
These shelters/service providers serve the identified homeless needs population in the Town of Tonawanda and the Village of Kenmore. They serve the homeless youth, runaway youth, and victims of domestic violence with children.

PRIVATE INDUSTRY:
Developers, property owners, managers and lenders:
The private sector has extensive experience and involvement with commercial and private housing programs. Private industry used its expertise, for example, to rehabilitate Mt. Saint Mary’s Academy site in the Town of Tonawanda converting a portion of the vacant convent into 40 housing units for senior citizens. Property owners have rehabilitated over 330 rental units for low-income households in the Sheridan Parkside Village Courts neighborhood under the HUD and New York State Rental Rehabilitation Program between 1983 and 1988.

Home Repair Contractors:
The Town of Tonawanda operates housing rehabilitation loan programs with CDBG funds to provide interest free, deferred payment loans to low-and-moderate income homeowners. Homeowners, in turn, select and contract with private contractors to undertake necessary code violation rehabilitation work.

Low Income Housing Tax Credits:
Tax credits are taken in annual installments over ten years for newly constructed or rehabilitated low income rental housing. This program provides tax credits to investors in return for a capital investment in a low-income housing rental project. This assistance can be provided to new construction or substantial rehabilitation projects that serve a special needs population as well as a general population of low income individuals and families.

OVERCOMING GAPS:
Assessment and Strategy to Overcome Gaps:
New York State and Erie County have an excellent network of service agencies that are able to provide an impressive array of much needed supportive services for housing. In its communications with service agencies regarding the existence of gaps in the institutional structure for providing supportive services for housing, the
general consensus by the Community Development staff was that there are no apparent gaps and that the existing matrix of agencies is well equipped to deal with the client base either through in-house resources or through referrals and networking with other existing social service agencies. The most common need expressed was for direct housing assistance through Section 8 Vouchers and Certificates.

**Monitoring**

1. **Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.**

**Program Year 3 Action Plan Monitoring response:**

The town plans to implement the following monitoring procedure for subrecipients:

1. Every subrecipient will enter into a contract with the Town of Tonawanda through Town Board action and by the agency's authorized agent. The Scope of Services will be included as part of the terms and conditions of the contract that agency individuals be identified who are responsible for payments, verification, record keeping and use of program income, etc. Financial reporting requirements, record keeping procedures, and audit requirements will be established as part of the contract.

2. Subrecipients will be monitored where technical assistance was not provided. The Town of Tonawanda CD office staff will offer technical assistance to subrecipients with activity that the town feels is necessary to ensure that it is conducted in accordance with the rules and regulations of the CDBG program. Additionally, each entity will provide the Town of Tonawanda CD office with a copy of their annual audit for review by the CD office for non-compliance.

The town will provide technical assistance to ensure the following:

- The subrecipient's compliance with statutory and regulatory requirements.
- The subrecipient's performance progress under its contract. Project files will be reviewed.
- Review of any remedies for the resolution of complaints.
- Review of progress and expenditure of funds to include information that is being submitted to the HUD Integrated Disbursement Information System.
- Review the use of program funds and program income derived from the grant allocation.
- That the subrecipient activities are consistent with the Consolidated Plan and Annual Plan and implemented in a timely manner.

Town staff will be conducting reviews in FY 2012 for all of its subrecipient organizations including the Village of Kenmore, Supportive Services, Belmont Shelter, Neighborhood Legal Services, and all of our ESG recipients.

**Self Monitoring -**
On an ongoing basis, the Community Development Office implements the following internal compliance procedures to ensure that the programs and activities funded with CDBG, HOME, and ESG monies are carried out in accordance with all applicable federal laws, rules and regulations governing performance, record-keeping fiscal management, non-discrimination and actions to further fair housing, property management, procurement, labor standards, relocation and anti-displacement rehabilitation, public services, public facilities and improvements, acquisition, disposition, relocation, planning and administration.

- The Director of Community Development has staff meetings with program personnel during the Annual Plan process when selecting programs and activities and when programs and activities are actually being implemented to assure that the applicable CDBG/ESG/HOME program requirements, as outlined above, are being met.
- Training of staff at HUD seminars and staff meetings with adjacent CDBG Entitlement communities provide an opportunity to clarify the various federal laws and regulations, as well as the problems and issues that each community has faced.
- The Director provides resource materials (each grant's federal regulations, OMB circulars, HUD policy, CPD notices, the Guide to Eligible Activities, etc.).
- Record review by staff and Director to ensure program performance, financial performance and regulatory compliance benchmarks are being met.
- Every day is a compliance review day to ensure that programs and activities are being carried out in a timely manner and that federal funds are being spent in a timely manner.

**Lead-based Paint**

1. **Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.**

**Program Year 3 Action Plan Lead-based Paint response:**

All prospective homeowners applying for rehabilitation funding are advised in an application cover letter of the new LBP regulations and the possibility of being relocated (as well as tenants if it is a multi-unit) during the removal of any lead hazard found during the process. A “Lead Poisoning And Your Children” pamphlet is included with all residential rehabilitation application forms. During initial inspection of a property, a Code Enforcement Officer will explain how the LBP regulations apply to the Town of Tonawanda Residential Rehabilitation Program.

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

The Town retains the services of a LBP testing contractor annually at a cost not to exceed $35,000 to perform testing services for the residential rehabilitation program. If the rehab client’s home was built before 1978, then the Code Enforcement Officer will require that a Risk Assessment be performed by the LBP Testing Contractor. The firm will provide the necessary lead hazard testing for the Town of Tonawanda. All costs associated with the Risk Assessment will be paid by the Town of Tonawanda.
Risk Assessment test results are evaluated by the CD Code Enforcement Officer. If he concurs with the report, Work Write-Ups/Specifications are prepared by the Officer for items identified in the Risk Assessment as being in need of hazard control. A copy of the Lead Risk Assessment is provided to the homeowner (and to the tenant if it is a multi-unit) when the specifications are delivered to the homeowner.

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

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

Housing

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. **Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.**

2. **Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.**

Program Year 3 Action Plan Specific Objectives response:

**DH-1 Availability/Accessibility of Decent Housing:**

- **Acquisition and Demolition Program:** In 2012, the Town of Tonawanda will be budgeting for the acquisition and demolition of 3 structures containing 8 units of vacant substandard housing units. The Town’s original 5-year goal of acquiring and demolishing over 100 units will most likely not be met due to the 30% budget cut over the last 2 years. The Town will demolish all structures that have been acquired in 2012 during FY 2013.

- **Home Ownership for Parkside’s Enhancement (H.O.P.E) and the Town’s HOME First-Time Homeowner Program:** Through the Amherst-Cheektowaga-Tonawanda (A-C-T) HOME Consortium, the Town allocates resources to a Community Housing Development Organization called New Opportunities Community Housing Development Organization for the construction of new, affordable single-family homes for income qualified first-time homebuyers. In 2012, the Town intends on constructing a new home in Old Town and 2 homes will be constructed using NSP funds in the Sheridan-Parkside Neighborhood. The Town has a goal of constructing
15 new homes over the 5-year period covered under the current Consolidated Plan, but new home construction will likely cease after this year due to the 33% budget cut in HOME funding and the 30% cut to CDBG.

- **Homeless Service Providers:** Under the McKinney-Vento Act, the Town uses Emergency Solutions Grant funds to assist those persons who are in need of temporary housing and services to assist them into more permanent housing situations. In 2012, the Town of Tonawanda will contract with the Franciscan Center, Compass House, Family Promise of Western New York, and Belmont Housing Resources for WNY to assist mainly runaway youth, victims of domestic violence, and others facing homelessness situations. The Town has a five-year goal of assisting 250 homeless individuals and 50 families affected by domestic violence. The emergency shelter providers had previously exceeded that goal in the last five-year period and plan on assisting at least that many individuals and families within the next 5-year CP period.

- **Residential Rehabilitation:** The Town will continue to fund the residential rehabilitation program to address the needs of low to moderate income homeowners that are in need of significant repairs on their homes. In FY 2012, the Town will budget for 18 rehabilitation jobs. The Town has a five-year goal of rehabilitating 100 homes of low-moderate income residents. The program allows homeowners to take out a 0% interest, deferred payment loan to make any repairs necessary to bring the home up to a standard condition. Currently, the Town has 431 families on a waiting list for the program. The Town also prioritizes Emergency Repair needs in the program to address public health and safety issues as they arise throughout the year.

- **Residential Accessibility Modification Program:** The Town will also provide 0% interest, deferred payment loans to qualified applicants to create accessible home modifications to keep disabled persons in their primary homes instead of in an institutional setting. The Town hopes to provide at least 5 disabled persons with home improvement loans over the course of 5 years. With an increasing elderly population and returning veteran’s from foreign wars, we are beginning to see more need for home modifications. There is a lack of handicap-accessible housing units within the Town and many case studies show that disabled persons would much rather stay in their primary homes rather than be institutionalized. The Town will budget for 2 accessibility-modification program loans during FY 2012.

**DH-2 Affordability of Decent Housing:**

- **H.O.P.E & HOME First-Time Home Owner – New Construction Programs:** The Town will provide housing subsidy assistance, closing cost assistance, and interest rate reduction assistance to create affordable mortgage arrangements for the new homeowners in the Sheridan Parkside Village Courts Neighborhood. The Town has a five-year goal of assisting 15 households. During FY 2012, 3 homeowners will be assisted.

- **First-Time Homebuyer Program – Existing Home Program:** The Town will assist 6 first-time homebuyers of existing homes in the Town of Tonawanda and the Village of Kenmore during FY 2012. This program offers first-time homebuyers a $7,500 0% interest, deferred payment loan to cover closing costs associated with the purchase of an existing home with a mortgage value of less than $100,000.
Weatherization – In 2012, the Town will enter into a contract with Supportive Services Corporation to provide at least 20 low-moderate income families in the Town and Village with an energy audit and repair work to make their homes more energy efficient. The Town has a five-year goal to assist 100 families.

Direct Rental Assistance – The Section 8 Certificate & Voucher Program will continue to be administered through Belmont Housing Resources of WNY for the benefit of low income residents throughout Erie County. During FY 2012, approximately 36 renters will receive assistance.

DH-3 Sustainability of Decent Housing:

Code Enforcement: The Town will continue a code enforcement program in 2012 that has become very effective by citing homeowners for violations of the State and Local Building Codes whenever any maintenance issues arise. In FY 2012, approximately 30 properties located in Sheridan-Parkside Village Courts, Kenilworth, and Old Town will be cited for violations of building codes and brought into code compliance.

Lead-Based Paint (LBP) Remediation: LBP testing and remediation will continue to be implemented in all of the Town and Village properties that participate in the rehabilitation program. In FY 2012, 18 properties will be remediated by contractor’s participating in the CD program.

A detailed description of where and how the federal, state, private, and non-profit funds are explained in the Institutional Structure section of this plan. These funds are expected to be available to the town for activities during the 2012 fiscal year.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 3 Action Plan Public Housing Strategy response:
Within the Town of Tonawanda, the Kenmore Housing Authority (KHA) has 194 units of public housing located in two mid-rise adjacent building with 97 units in each building. Up until 2006, the KHA administered 20 Section 8 Rental Vouchers for low-income families and the elderly. The Authority has since transferred that authorization to Belmont Shelter. The Authority is located at 657 Colvin Boulevard in the Village of Kenmore, New York.

The Authority normally maintains fully occupancy. There are 10 handicapped units in each building and there are no handicapped tenants in residence who need to be transferred to a handicapped unit. In terms of income, 69 percent of the tenants qualify as very low income being under 31 percent of the median income for the metropolitan area, 29 percent as low-income at 31-50 percent of the median income and only two percent qualify as moderate income at 51-80 percent of the median income. Residents pay 30 percent of their income for rent. Additionally, HUD annually allots funds to cover all costs for operation and maintenance of the buildings.

There are 473 applicants on the Kenmore HA waiting list, including 205 applicants who qualify as handicapped. The KHA also has adopted a local preference ruling whereby all Village of Kenmore residents receive first priority, Town of Tonawanda residents receive second priority and all other applicants are placed on a third waiting list.

For the past several years, the Authority has experienced a turnover rate of 15 percent or about 30 units per year. This is a relatively high turnover rate when compared with earlier years. This is due in part to the increased average age of tenants at the time of admission. This, in turn, has resulted in less average time in residence as these older tenants age in place and can no longer live independently in an apartment. This translates into increased workload not only for the administrative staff handling and processing new dwelling leases but for the maintenance staff as well with apartment preparations.

Since the last Consolidated Plan, the Authority has transferred three apartments in each building to off-line status reducing the number to 97 in each building. One apartment in each building was converted to a computer lab with three computers that are available for tenant use. Very few tenants own their own computer. The other two apartments in each building were converted to administrative storage and maintenance storage.

The KHA units are in excellent condition. The Kenmore Village Apartments (KVA) was completed in 1975 and Theater Apartments was completed in 1985. Both have poured concrete and a brick exterior with aluminum clad steel dual pane windows. HUD provides an annual allocation to the Authority under its Capital Fund (CF) Program for necessary capital improvements.

Several improvements have been made since the publication of the 2005-2009 Consolidated Plan. Under its Capital Fund Program, management has installed in both buildings a new video surveillance system complete with 6 cameras located throughout the entire first/ground floor and connected to a DVD recorder, which can be monitored by Management. The parking lots for both buildings were also totally re-surfaced with new asphalt and re-lined and numbered for tenancy.
Additional updates for the Kenmore Village Apartments include an expansive Heat Conversion project whereby all tenant heating (apartment) was transferred from electric baseboard heat to hot water heat utilizing 2 new boilers and vertical risers. The laundry room at KVA was expanded to accommodate not only more machines, but also allows full handicapped accessibility. In addition, management has continued to improve the exterior groundwork, including replacement of several sidewalks and new sod in the front of the building.

Additional updates for the Theater Apartments included replacement of the roof in 2009. All apartments and doors throughout the building received new door locks through the BEST Co. and keys can only be processed through that company, an excellent safety/security measure.

The KHA management performs a Physical Needs Assessment every year and thus, more modernization projects are in the works for the upcoming years. At KVA, a Generator Replacement project was commenced and the entire lighting of the building will be transferred to more energy efficient bulbs and ballasts. The 34-year old windows in this building will be replaced over a two year period. The present 27 car parking lot on this small site may be expanded to accommodate an additional 4 or 5 cars. At Theater Apartments, bathroom vanities will be replaced along with the same energy efficient replacement lighting. Looking to the future, the kitchen cabinets also may be renovated or replaced. The entire building will be sealed/protected by a high density commercial product to add life-years to the brick overlay of the building exterior.

The KHA undergoes the Public Housing Assessment System (PHAS) which provides for an annual scoring system utilizing four indicators (financial, management, physical inspection and resident survey). The PHAS system rates the Housing Authority according to each of these four indicators. The KHA has achieved a "High Performer" rating for the past several years and the score in 2008 was 95%.

While the neighborhoods around the public housing are older, neither the public housing nor the neighborhood has negatively impacted on each other. The neighborhood is stable, needed street, housing, and infrastructure improvements are commensurate to the needs of a gracefully aging neighborhood. Community policing is not needed for this neighborhood.

The KHA Board members (5) are appointed by the Mayor of the Village of Kenmore for five-year terms. Also, two members of the Board are Public Housing residents elected by their peers for two-year terms, usually one from each building. The seven member Board meets monthly with the Executive Director and Management team. The Board also uses the HUD "Resident Satisfaction Survey" as a means of receiving input from the residents as well as periodic informational meetings. Also, as senior citizens, they have no interest in any homeownership options.

While there are no longer any resident organizations at either building, two tenants elected by the residents serve on the Authority Board. However, there is a Thursday social club that usually meets weekly. It is estimated that about 25 percent of the residents go to the Tonawanda Senior Center from time to time. About 5-10 percent of the tenants utilize the County run van service to participate in the County sponsored daily lunches that are provided at the Mang branch of the Tonawanda Senior Center. Another seven to eight percent of the tenants receive Meals on Wheels through the Parkview Community Center.
Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 3 Action Plan Barriers to Affordable Housing response:

The Town of Tonawanda has not identified any negative effect of local public policies impacting the availability of affordable housing. Consequently, no plan is set forth by the Town to address any negative effects of any public policies during the next year.

Proponents of affordable housing are increasingly confronted today with opposition that develops primarily due to a false perception of a specific population to be housed and a general ignorance of the implications of not providing such housing. This public misperception has dangerously crystallized into the phenomenon known as "NIMBYism" ("Not In My Back Yard") where residents rally against almost any type of development they perceive as inappropriate.

There are generally two courses of action to take to mitigate this barrier to a manageable level. A strategy which recognizes that both the developer/proposer and the recipient community have a responsibility in mitigating this barrier to a manageable level can establish a basis for positive results. It is essential that all parties concerned, including local review boards and affected residents, be sufficiently educated and informed regarding the importance and necessity of housing for special needs populations and the benefits that may accrue to the neighborhood and the community as a whole. Misconceptions and lack of accurate information may jeopardize a worthwhile project and prevent a need from being met. The proposer has an obligation to ensure that any such misconceptions be dispelled by providing accurate information about each project.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).

2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
   a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.

c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

d. Specify the required period of affordability, whether it is the minimum 15 years or longer.

e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.

f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:

a. Describe the planned use of the ADDI funds.

b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.

c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 3 Action Plan HOME/ADDI response:

The Town of Amherst, NY will report the HOME required information as they are the lead agency in the Amherst-Cheektowaga-Tonawanda HOME Consortium. The Town of Tonawanda will not receive any ADDI funds during FY 2012.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.
1. **Sources of Funds**—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction’s plan for the investment and use of funds directed toward homelessness.

2. **Homelessness**—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

3. **Chronic Homelessness**—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

4. **Homelessness Prevention**—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

5. **Discharge Coordination Policy**—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

**Program Year 3 Action Plan Special Needs response:**

The Town of Tonawanda will receive approximately $130,000 in Emergency Solutions Grant (ESG) funds for FY 2012 from the Department of Housing and Urban Development. At this time, the final rule for the Emergency Solutions Grant Program is being reviewed for implementation for next year’s programs. The final draft of our Annual Action Plan will contain these provisions. Initially, we plan on the following set of actions:

**Implementation of the Priority Needs and the Objectives of the Strategic Plan:**

The Town of Tonawanda has consistently adhered to the following process to notify Emergency Shelters of the town's criteria to select homeless service providers in Erie County. In accordance with the Town of Tonawanda ESG Administrative plan & procedures, the Office of Community Development notifies emergency shelters that it anticipates receiving an ESG and requests proposals for the use of funds. The interested service providers return a proposal. The homeless individuals served was established after interviewing Town of Tonawanda agencies and religious leaders that operate homeless services in the town. The homeless population in the Town of Tonawanda were identified mainly as runaway youth and the victims of domestic violence.
Emergency Shelters that serve the homeless population identified by the town are considered for receiving a Town ESG. The source and amount of matching funds used over the past two ESGs fiscal years are: donations, volunteer hours and staff salaries.

The Town of Tonawanda ESG funds for FY 2012 will assist the following providers of services to the homeless so that they may continue to offer their emergency services to those in the Town of Tonawanda and throughout Erie County:

- **Compass House:** A shelter for homeless youth programming will receive Town of Tonawanda FY 2012 ESG funds for operating costs estimated to be $34,000 for telephone, utilities, insurance and maintenance. $6,000 will be used for homeless prevention to provide rent deposits, and to pay the rent and utilities where youth have fallen behind in payments.

- **Family Promise of Western New York:** A network of local faith-based organizations provide transportation and start-up costs for homeless families seeking assistance.

- **The Franciscan Center:** A shelter for homeless youth will receive Town of Tonawanda fiscal year 2012 ESG funds to provide essential services ($10,000) for staff salaries for increased services to provide intense case management for residents along with life skills, guidance on health issues, assistance and training for employment interviews, recreation, assistance on maintaining sobriety or staying clean from substance abuse, etc.; and, operations ($10,000) to include utilities, as well as on-going repairs and maintenance.

- **Belmont Housing Resources for WNY:** A HUD certified housing counseling agency will be provided ESG resources to assist homeless individuals and families seeking temporary assistance. The goal of the program is to provide permanent housing solutions for those most at-risk or those already experiencing homelessness.

**Chronic Homelessness:** The Town of Tonawanda will provide emergency shelters with financial assistance from its annual Emergency Solutions Grant (ESG) as the shelters are the first-step in the process of ending chronic homelessness.

Most shelter clients (particularly families) indicate that they lived with family, friends, acquaintances, or in their own residence prior to requesting access to shelters. The top five most commonly cited primary reasons for entering a shelter include: no residence, violence in the home, family problems, eviction, need for mental health services, and drug and alcohol treatment. Other reasons include unsatisfactory housing, institutional release (e.g., hospital, prison, or treatment. In Erie County, homeless subpopulations include substance-addicted individuals, the mentally ill, MICA (as a separate and distinct category), military veterans, individuals living with HIV/AIDS, domestic violence victims, physically or developmentally disabled, and youth (12-18) populations.
BARRIERS TO ENDING CHRONIC HOMELESSNESS: The shelters have limited resources. The majority of shelters offer some form of counseling, case management, clothing assistance, life skills training, and assistance with personal needs. However, the availability and quality of these services varies greatly. Some facilities have access to staff members or referral agencies trained to offer substance abuse, mental health counseling, and/or medical services on-site. But, the vast majority of providers do not. Many facilities make referrals to other agencies to assist their clients. Assistance with legal issues, housing and benefits questions, veteran services, and job training are most often referred to other agencies. Those leaving shelter programs do not fair much better with regard to access to mainstream benefits. As noted above, the availability and quality of counseling and case management within area shelters varies greatly. Thus, clients may not receive all the help they need accessing governmental support. Commission research suggests that at shelter program exit, 11% of shelter clients receive SSI, 35% are accessing TANF, 43% receive Medicaid, and 37% have obtained food stamps. While the number of individuals with no financial benefits has been greatly reduced, some 38% of shelter clients leave facilities without any resources.

Homeless persons do not have adequate financial resources to pay for services. Advocates note that homeless persons who lack financial resources or do not have a continued connection to government support are at great risk for returning to homelessness. Even with mainstream resources, homeless clients leaving area shelters face barriers in their return to self sufficiency. Greater collaboration between shelter providers and governmental benefit programs are needed to ensure that clients receive the assistance they are eligible to receive. Thankfully, the Homeless Alliance of WNY provides a monthly forum to increase communication between agencies.

The regional plan that has been created to end homelessness is known as the PRISM Project. The initiative has five over-arching goals:

- PREVENTION - Expand the range and availability of homeless prevention strategies, increase immediate accessibility, and improve long-term effectiveness in order to reduce the number of chronically homeless individuals in our community.
- RESOURCES - Increase awareness of and linkages to mainstream and community resources including: Medicaid, Child Health Insurance Programs, Temporary Assistance to Needy Families, Food Stamps, Social Security Insurance, and Veterans Health Care.
- INDEPENDENCE THROUGH HOUSING - Expand the availability of affordable permanent housing for chronically homeless individuals by adopting a “Housing First” philosophy.
- SERVICES - Improve service provision throughout the homeless continuum of care by increasing relationships among homeless housing and service providers.
- MAINTENANCE – Improved follow-up and wrap-around assistance to ensure self-sufficiency.
The above-stated goals require a substantial re-orientation of the homeless service delivery system, as well as an evaluation of the use of current resources and significant cross-system collaboration. To this end, ECCH will work with its membership to develop periodic action plans that detail short-term implementation strategies and identify needed changes to the current homeless continuum of care. These action plans will form the basis to end chronic homelessness and will make it possible to identify what additional services or linkages are needed to reduce the number of chronically homeless individuals living on the streets or in emergency shelters in Western New York.

The town will undertake the following activities using available resources to prevent homelessness and to meet existing homeless needs:

A. Prevent low-income individuals and families from becoming homeless. Reducing housing costs will make housing more affordable and thereby prevent homelessness.

i. Owner Households:
Using Community Development Block Grant and HOME Investment Partnership funds, the Consortium Towns will provide low income homeowners a 0% or low interest, deferred-payment loans to correct minor and major deficiencies and/or code violations. Using Community Development Block Grant funds, the Towns, in cooperation with Supportive Services, will offer a weatherization program to low-income homeowners for a variety of energy saving improvements.

ii. Renter Households:
Through the Department of Housing and Urban Development's Section 8 Existing and Project- Based Programs, certificates or vouchers will be provided to low-income renters, thereby reducing their housing costs. Through the Department of Housing and Urban Development's Hope For Elderly Independence Program, a Section 8 certificate or voucher with supportive services will be provided to the frail elderly person.

iii. Neighborhood Legal Services jointly offers a Homelessness Prevention Program working with low income renter & owner households threatened with eviction or foreclosure and provide the services to enable these households to remain in their homes. They offer the following services:
- information on tenant rights and responsibilities and the eviction process;
- budget counseling;
- landlord/tenant mediation;
- counseling and referrals to other available services;
- referrals for financial assistance, when available;
- legal advice;
- legal representation;
- mortgage default counseling.
iv. Other Federal and State resources will be made available to low income families to prevent homelessness, such as, SSI (Supplemental Security Income), Social Service programs, and Job Training through the Erie County Private Industry Council Employment and Training Office. During FY2012, the Town will have Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds available to provide temporary assistance for those who are homeless or at-risk of becoming homeless. The Town has partnered with Belmont Housing Resources of WNY and Neighborhood Legal Services to meet the objectives of the program by providing a wide array of services. This program has already assisted 245 households and will exhaust available funds during FY2012.

B. Helping the homeless person make the transition to permanent housing and independent living.

Using the Department of Housing and Urban Development Section 8 certificate and voucher programs, assistance will be provided to homeless persons to secure permanent, affordable housing. The Erie County PHA Consortium has set aside 222 vouchers for the homeless and administers 24 vouchers for homeless disabled veterans with services provided by the Veterans Administration Hospital. Additionally, vacant units under the Section 8 Moderate Rehabilitation program and Section 8 Project Based Assistance program will offer permanent, affordable housing to homeless persons.

Through the HUD funded Homeless Initiative Program, persons who are homeless will be assisted to find a permanent home. This program is operated by a consortium of agencies which includes the Salvation Army, YWCA and the Seventy-Eight Restoration Corporation. The following will be provided:

a. Telephones for calling landlords
b. Help with transportation expenses while apartment hunting
c. Child care for younger children while looking for a place to live
d. Assist qualified persons with the first month's rent or security deposit
e. Information and assistance finding an affordable place to rent
f. Special assistance with family concerns -- for qualified persons
g. Referrals to other agencies that can help with particular problems
h. Referral to Job Training
j. Workshops to assist:
   - How to Find the Right Apartment
   - Tenant/Landlord Rights and Responsibilities
   - Budgeting
   - Problem Solving

Discharge Coordination Policy: One of the Homeless Alliance of WNY’s goals is to assist at-risk and hard-to-serve individuals and families in maintaining a safe living environment. To that end, it is necessary to improve the outreach and assessment efforts through proper discharge planning, use of case management and outreach teams, and community collaborations.
The Town of Tonawanda will be providing outreach information to all of the social service and health related agencies that may have contact with homeless or at-risk persons about the services provided by the Town’s ESG subrecipients and other Western New York Service providers. The Office of Community Development will provide emergency shelter service information and contact numbers to the Police Department, religious institutions, emergency clinics, Kenmore Mercy Hospital, and other agencies that experience homeless persons requiring assistance.

The Office of Community Development also monitors its ESG subrecipients throughout the year to make sure that those people discharged from the shelter are being sufficiently tracked and have the tools necessary to make the transition to a more permanent, safe housing environment.

**Emergency Shelter Grants (ESG)**

*(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.*

**Program Year 3 Action Plan ESG response:**

N/A

**COMMUNITY DEVELOPMENT**

**Community Development**

*Please also refer to the Community Development Table in the Needs.xls workbook.*

1. **Identify the jurisdiction’s priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.**

2. **Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.**

   *Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.*

**Program Year 3 Action Plan Community Development response:**
The Town of Tonawanda is a first-ring suburb of the City of Buffalo and has some of the oldest housing stock in Erie County. 80% of the housing was built prior to 1960. As a complementary initiative to housing programs, the Town recognizes the importance of comprehensive neighborhood stabilization efforts in low-income residential areas. It is important to prevent or ameliorate deterioration in neighborhoods since the deterioration of neighborhoods will eventually result in the loss of some of the Town's most affordable housing stock. The community development focus of the Town is to maintain the suitable living environment which it now enjoys through achieving the following objectives:

**INFRASTRUCTURE IMPROVEMENTS:**

- **Long-Term Objective** – The Town’s long-term objective is to improve the condition of our neighborhoods through the installation of curbs, streets, sidewalks, fire hydrants, storm drainage, sanitary sewers, water mains, tree planting, traffic signals, street signs, and other public space improvements. This approach acknowledges that all of the neighborhood components will have to be addressed. There will be nowhere for homes to be built without operational public streets and infrastructure. They make the neighborhood work. If the Town neglects investing in public infrastructure then subsequently resident owners will not invest in their properties.

The long-term objective in the Town of Tonawanda will pay special attention to the public improvements in its three major preservation neighborhoods and those in the Village of Kenmore, as they are eligible for assistance under the Community Development Block Grant Program.

When housing and community development needs are identified in the other eligible census block groups, the town will attend to the identified needs in the following grant year in order to stop the deterioration from spreading. Each year, the Town of Tonawanda will continue to review all CD eligible neighborhoods to monitor community conditions and needs. Each year, CDBG funds will be used to address identified infrastructure and other public space needs, thereby strengthening and protecting existing viable components of neighborhoods through the elimination of existing or potential threats to the public health, safety and general welfare of residents of the town.

- **Short-Term Objective**– The Village of Kenmore will be reconstructing sidewalks in low-moderate income neighborhoods. The total reconstruction effort will take place throughout the summer of 2012. The Village Public Works Department will be directing the project.

**PUBLIC FACILITIES:**
- **Long-Term Objective** - The town has extensive park and recreation systems which are ideally integrated into the residential environment. Neighborhood parks and playgrounds can exert a positive impact on the quality of life of area residents and assist in supporting neighborhood stability and property values. The age of the park/recreation system requires a systematic updating of their components. In light of this, the town will pursue a systematic program to prevent or reduce deterioration in neighborhood parks and recreation facilities serving low-income areas through their redevelopment to standards that will allow the park to function in a safe and healthy manner. Among items to be assessed will be the facilities themselves and the passive and active park and recreation components within the facilities, the availability of a variety of recreational experiences required by residents of the Town of Tonawanda and Village of Kenmore, the recreational needs of various age groups and the need for organized recreational activities and programs, particularly for low-income area children and residents. Over the years, for example, acreage will be added to the existing Central Park in the Sheridan Parkside Village neighborhood.

The Towns' senior citizen population (age 60+) decreased by 1,938 between 1990 and 2000. Within this group, however, the 75+ age group increased by 2,328. Overall, the senior population represents 25% of the total town's population. Although this population sector has stabilized, it nevertheless represents one out of every four persons in the population and has and will continue to put a significant demand on the use of the Town and Village senior centers. Future years may require that CDBG funds be used to add additional space to the center itself or parking space to accommodate the increased demand for use of the senior center.

The Town of Tonawanda Highway Department has an urban forestry division that works on the tree lined streets throughout the Town. They have been very busy handling the replacement of thousands of trees decimated after the October Storm of 2006. The tree replacement program is a necessary component of sustaining a livable environment.

- **Short-Term Objective** – During FY 2012, the division of forestry will replant approximately 40 trees in low-moderate income neighborhoods. They will also continue the operation of the Old Town Tree Farm located at 54 Riverdale Avenue. The trees will mainly be installed along streets in the Old Town Neighborhood.

- **Short-Term Objective** – During FY 2012, the Town will begin to renovate the Sheridan-Parkside Community Center. The facility has an aging roof, windows, and HVAC systems. The facility serves as the headquarters for the local Meals on Wheels, Youth Center, a Head Start Program, and a LEAP program reading library. It is anticipated that this project will be a multi-year activity.

**PUBLIC SERVICE NEEDS:**

- **Long-Term Objective** - The Town of Tonawanda Police Department will offer the benefits of police protection and public safety to preservation neighborhoods which exhibit a higher number of incidences of criminal activity. A Community Policing Satellite office is located at the Sheridan Parkside Village Courts Parkside Community Building and a Community Policing Satellite building for Lincoln Park and Kenilworth neighborhoods.
Meeting the recreational needs of children are vital to decreasing the potential for juvenile delinquency. Neighborhoods that need additional recreational activities will be funded so as to provide positive activity and interaction among the young in the neighborhood.

The Village of Kenmore offers the benefits of police protection and public safety to preservation neighborhoods which exhibit a great number of incidences of criminal activity in eligible census blocks in the central southern portion of the Village.

As a result of the dramatic increase in the senior citizen population, the town may have to increase services provided to its elderly population. Ongoing assessment of the services now provided will determine the point and time when additional services shall be provided.

Housing counseling has exhibited itself as a key element in diffusing conflicts in the neighborhood and also leads to secure housing choices for Village and Town residents. Such counseling has a positive resolution of tenant/landlord conflicts, increasing of credit worthiness, and ultimately assists low to moderate income clients with securing permanent affordable housing.

Weatherization offered to income-qualified homeowners and tenants will help reduce the increase in the cost of heating, which has dramatically increased. High utility costs have created an economic strain on all families, especially those who are low-income.

- **Short-Term Objective** - Using CDBG funds, the Town of Tonawanda will continue the Community Policing programs in the Kenilworth, Lincoln Park, Old Town and Sheridan Parkside Village Courts. The Village of Kenmore will continue a Community Policing program in the eligible block groups in the central southern portion of the Village.

- **Short-Term Objective** - Housing counseling offered through Belmont Housing Resources for WNY and a weatherization program offered through Supportive Services Corporation will be available throughout the Town of Tonawanda and Village of Kenmore during FY2012.

- **Short-Term Objective** – During FY 2012, the Prime-Time Program will provide Youth Programming for low-moderate income families in the Sheridan-Parkside Neighborhood. The program is run through the Town’s Youth, Parks, and Recreation Department and has been shown to have a positive impact on the health & safety of the neighborhood.

**ECONOMIC DEVELOPMENT NEEDS:**

- **Long-Term Objective** - Provide for the economic stability and well-being of the town and its residents through: the retention of existing businesses and jobs and the creation of new employment opportunities especially for low and moderate income people; the diversification of business activity in the town; the expansion of the town’s tax base; maintaining the economic viability of neighborhood commercial centers; and encouraging the development of business parks and centers in conformance with applicable codes and regulations.
The town will also focus on the need for redevelopment of the so-called transitional business areas. These areas are typically located within the older sections of the town bordering on the City of Buffalo.

- Short-Term Objective - With the Town of Tonawanda receiving Empire Zone designation in November of 2002 companies moving into the Empire Zone will benefit from: 1) No property or payroll taxes or taxes on purchase of equipment, and; 2) The Empire Zone rules require that residents of Sheridan Parkside Village Courts receive special consideration when a company locating in the Empire Zone is hiring. As of the end of 2010, the State has ceased accepting new businesses into the Empire Zone although benefits will continue for a limited benefit period (1-10 years depending on when they were accepted into the zone).

The New York State Department of Labor opened a mobile office in the Parkside Village Community Building, as a result of the Empire Zone, to assist any person seeking employment. Companies assisted by the Empire Zone provide residents of Sheridan Parkside Village Courts close access to job banks and job fairs that they conduct. They also conduct job testing within the Community Center as needed.

The town has pursued efforts to diversify the local economy by strongly considering "white collar" jobs. The Town of Tonawanda is continuing its efforts to create the North Youngmann Commerce Center site, a 90-acre site located north of the Youngmann Highway at East Park Drive.

When GEICO received approval from the Town of Tonawanda to receive town Empire Zone Program benefits, the company pledged $2 million dollars to the Town of Tonawanda over a period of twenty years to assist with the development of the North Youngman Commerce Center site. The Town of Tonawanda will bond to develop the infrastructure within the North Youngman Commerce Center. The twenty-year bond will be paid off using the GEICO stream of revenue.

To date GEICO created over 1,200 new jobs and has held three job fairs in the Sheridan-Parkside Community Building.

The Town's Empire Zone was also the key financial incentive program that lead to the development of Colvin Woods Commerce Park, a private commercial park that will house five companies that expect to provide nearly 800 jobs. The Town of Tonawanda Development Corporation will continue to market the Commerce Park throughout 2012.

The Riverview Commerce Center, a 100-acre private commerce park, is now fully developed, and is being marketed. Several parcels next to the Riverview site have been environmentally investigated and are ready to market for future development as well.

**PLANNING NEEDS:**
Town of Tonawanda

- Long Term Objective - In 2006, the Town of Tonawanda Planning Board hired Wendel Duechscherer, Inc. to prepare the Town of Tonawanda Comprehensive Plan. The Plan was paid for with town funds. It updated previous plans for the entire Town of Tonawanda and Village of Kenmore. The comprehensive plan was adopted by the Town Board in 2006. The comprehensive plan outlines general goals and land use policies to be followed. More specific neighborhood plans may be necessary in order to identify unique neighborhood needs and to create a development plan for meeting those needs.

Short Term Objective - The Sheridan Parkside Village Courts Redevelopment Neighborhood Plan completed in 2003 describes the future vision of the neighborhood utilizing a variety of concept maps and descriptions. There is a need for some minor amendments to the original concept plan since the Erie County Library closed three neighborhood libraries in Town. Other neighborhood concerns regarding commercial uses along Sheridan Drive and Ensminger Road need to be addressed as well. During FY 2012, the Office of Community Development will continue a community planning effort to amend some aspects of the neighborhood plan to address future needs.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 3 Action Plan Antipoverty Strategy response:

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

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

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

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

The Town of Tonawanda Empire Zone made the creation of jobs more attractive; no property tax, payroll tax, or sales tax on the purchase of equipment is required to be paid. The Empire Zone rules require that residents of Sheridan Parkside Village Courts receive special consideration when a company in the Empire Zone is hiring. The companies that have located in the zone will continue to receive benefits for 1-10 years depending on their initial start date in the zone.
The Town is also proactively planning and investing in infrastructure in two new business parks at the North Youngman Commerce Center and the Riverview Commerce Park that contain a total of 150 acres of “shovel-ready” land for redevelopment. Both projects benefited from the Empire Zone designation and will hopefully remain part of any successor program that New York State develops.

Training and employment opportunities for low- and moderate-income persons:

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

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

Community Development prepared neighborhood newsletters will continue to be published and sent to the Sheridan Parkside Village Courts, Old Town, Kenilworth Lincoln Park neighborhoods advising residents of employment opportunities and economic development in the Town of Tonawanda.

**NON-HOMELESS SPECIAL NEEDS HOUSING**

**Non-homeless Special Needs (91.220 (c) and (e))**

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.*

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

Although there are several diverse special needs population groups that are identified in accordance with the Consolidated Plan requirements, virtually all have a common denominator of requiring varying degrees of support and assistance.

Early in the planning process, meetings were scheduled with organizations that provide services and/or housing to special needs populations. These organizations included those with oversight responsibilities as well as several that are direct providers of services and/or housing. The value of these meetings is that they provided insights into general trends and activities. Follow-up contact was made
with many of the attendees to obtain more specific information about their programs and activities.

Although it has been in place for several years, the state-mandated unified "Single Point of Entry" process is now more widespread and used more in depth by several county departments, particularly as it deals with the various human services. The purpose of the Single Point of Entry process is to have one shared record of each individual seeking some form of assistance through County programs. This tracking system utilizes a single data input process to obtain basic information on each person that can be used across program or departmental lines. Information is available to indicate what services have been or are being provided and tells service providers what other programs or departments working with a particular individual. The system is also useful for services provided by organizations that are not part of County government.

Over the last five years, there has been more collaboration between and among departments and organizations. This is due in part to budgetary constraints, but may also reflect the natural evolution of the unified Single Point of Entry process. The Social Service Department noted the increased availability of “online” entry for information and registration for needed social services. This technological access no doubt is available in other departments in varying degrees.

There is also evidence that County departments and nonprofit organizations are conducting outreach activities to connect individuals and households with needed assistance. This serves as a preventative measure to control and minimize problems at earlier stages.

Based on the meetings as well as follow-up discussions with various organizations, individuals from “at-risk” populations are increasingly interested in independent living arrangements. Likewise many of the “at risk” populations that now live independently are seeking support services that will enable them to continue to live independently in their own homes or apartments.

Administrators of various programs noted an increased demand and eligibility for services from the first ring of suburbs. This is due to several factors. One is the increasing proportion of senior citizens in suburban jurisdictions that are looking for support services, especially in many instances where their children have left the area for employment out of state. Also, more senior citizens are experiencing difficulty in maintaining their homes.

Over the past three or four decades, the continuing population decline, the outmigration of younger persons with a college education and the shift in population from cities to outlying suburbs has had an impact on the first ring of suburbs in terms of increased demand for services.

One positive benefit of the national and local recession is the increased number and qualifications of college graduates who are seeking often entry level jobs with the County as well as nonprofit organizations.

**Needs of the Elderly and Frail Elderly Persons.** Assessment and evaluation of the needs of the elderly and frail elderly persons was undertaken at two levels. An overall County perspective was obtained from the Erie County Department of Senior Services. The Department receives and allocates state and federal funding, and has
contractual relationships with local senior centers. While some senior centers in Erie County provide outreach and direct access to support services, others offer only recreational activities, and senior citizens must contact the County Department of Senior Services directly to address other needs.

The mission of the Erie County Department of Senior Services is to provide leadership to promote the optimal well being of older adults by empowering them to lead lives of independence, health and dignity and to facilitate the development of comprehensive, coordinate and cost-effective services with the community to meet present and future needs of seniors and their caregivers.

The Department of Senior Services provides a wide variety of services to approximately 30,000 people who are 60 or older, in addition to their caregivers. Since the year 2000, the U.S. Census estimates that by 2015 there will be a 7.6 percent increase in the number of persons age 60 and over living in Erie County and within that group there will be a 28 percent increase in the 85+ age group. Concurrently, the total population of the County continues to decline. The U.S. Census estimate for Erie County for 2007 shows a 3.9 percent decline in overall population since the 2000 Census.

In its Annual Implementation Plan, the Department of Senior Services has several priorities, goals, and objectives. Although a total of eight goals are listed, these appear to particularly relevant to the Consolidated Plan:

- **Development policies and resources that address the difficulties older adults experience in maintaining their home and properties.** Activities include the expansion of the Minor Residential Repair program to assist additional vulnerable seniors with critical home maintenance tasks.

- **Identify ways to address the transportation needs of seniors** including participation in new initiatives such as “New Freedom” and United We Ride and continue to participate in activities that support a more efficient, cost effective mobility management system for seniors and adults with disabilities.

Among the focus group participant and the service providers, the number one priority concern is the need for transportation for those people who no longer drive or who are unable to use public transportation. While this may not appear to be particularly related to housing, it would appear to be a critical factor in enabling senior citizens to live independently longer in their current residence. If people are able to have transportation to shop, go to medical services appointments, and take care of needs, they are more likely to be able to live independently longer.

- **Strengthen and promote the Erie County NY Connects point of entry program** designed to empower individuals to make informed choices about their long term care.

- **Engage in activities that promote the continuous improvement of Senior Services’ management and service delivery capabilities** through the implementation of various initiatives such as Lean Six Sigma, performance budgeting, and the further development of performance outcome measures. In an era of scarce resources, continuous management improvement becomes an essential ongoing activity.
Project CODA: Creating Options for Dignified Aging. The aforementioned County Senior Services report cited the interest on the part of both senior citizens and providers of services to seniors for continuing independent living as long as possible. During 2008 a project was launched locally called Creating Options for Dignified Aging (CODA). Available in detail at www.chfwcny.org, the project was undertaken by the Community Health Foundation of Western New York to provide a guide for health system strategic planning over the next 20 years, inform policy makers about the need for regulatory change, and promote sound decisions making regarding programmatic and financial investment in elderly services. The planning committee for the project and report consisted of representation of the two hospital systems in Erie County, the NYS Department of Health, continuum of care housing and nursing home providers, and other health care organizations in Erie and Niagara Counties.

One of the basic questions that guided the CODA project was: “What person-centered best practices or new approaches can be implemented to permit frail elders and older adults to live in the community and remain independent as long as possible?” The project team became increasingly aware that if the existing system is to be rebalanced, it is essential that drivers for change fully understand how the long-term care system works or does not work. Long-term supports and services include (a) institutionally-based services such as nursing homes; (b) services in alternative residential and community settings such as assisted living; and (c) personal support and services provided to people in their homes. It is in this third category where the County and local senior centers can play a role in helping seniors to live independently longer. Moreover it was noted in the report that the state has begun efforts to “rebalance” the state’s long term care systems to provide greater access to non-institutional, home and community-based alternatives.

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

Approximately 2,000 senior citizens age 60 or over pay the nominal charge for annual membership. Daily use of the main center averages between 100 to 150 persons per day. The Center offers some 75 recreation programs. Some activities are free and structured classes such as ceramics, paintings, dance lessons, and wood shop charge a fee. Seniors may also sign up for trips that may be both day trips as well as extended trips for one night or more.

Through the County nutrition program and local kitchen staffing, the Ensminger Road site offer daily lunches for a modest fee. Average participation is 50-60 persons per day. In addition, the County in cooperation with the Village of Kenmore offers a daily lunch program at the Kenmore-Mang branch. Lunch participation at this location averages about 50 persons per day.

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

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

In conjunction with the County, Meals on Wheels in the Town of Tonawanda are provided through the Parkside Community Center. An average of 200 to 250 meals per day are provided through the program.

**Needs of Persons with Severe Mental Illness.** Supportive housing continues to be a vital resource to the Erie County Department of Mental Health. The management of this resource is of high priority. While the current projection of unmet need is 300 units, an increase is anticipated due to the economic climate in the region. Furthermore, recent changes in state policy regarding the discharge of individuals from state correctional facilities could further escalate this figure.

The Erie County Department of Mental Health defines **supportive housing** as a scattered site apartment program that provides financial assistance and case management services to individuals with severe mental illness who reside in Erie County. The apartment is selected by the consumer and a tenant-based lease is established between the consumer and the landlord/housing development agency. Supportive housing continues to be the housing of preference for many individuals with severe mental illness, but it is also the type of housing with the longest waiting list. There are currently 314 individuals awaiting placement into supportive/supported housing in Erie County. While there has been a system to triage the highest-need individuals on these lists, many such persons require only a rental stipend to stabilize their housing needs. Many of the individuals awaiting placement are being served though the Single Point of Entry for Care Coordination (SPOE).

To create a more fluid system with greater oversight of resource capacity and utilization, the Erie County Department of Mental Health has instituted a Single Point of Access for Housing (SPOA). This system is evidence of further evolution of the previous Central Housing Placement System (CHPS). The Housing SPOA maintains oversight of the entire continuum of care in housing contracted though the Erie County Department of Mental Health including licensed housing resources. Currently, this system manages the capacity and utilization practices of 1,809 units of various types of housing, ranging from traditional community residential services to exit strategies out of supportive housing. With recognition of the limited resources available, management within the continuum has provided a more fluid system allowing for meaningful transition towards full independence.

As with all management systems, financial oversight is of great importance. The County Department of Mental Health oversees $1,000,000 in OMH-funded supported housing and over $15,000,000 in HUD housing grants on an annual basis. The Department has adopted a comprehensive set of policies and procedures that provide guidance in monitoring the fiscal performance of these programs on a monthly basis. Each of the 12 provider organizations involved in these programs are
monitored regularly and financial management is a key review criteria within the contract process. All providers are monitored via standard fiscal reports, and within their programs, all key variables, such as leasing subsidy determinations and the tracking of HUD matching funds, are monitored via standard policies, procedures and forms. To date, reviews from the local HUD office have commended the agency’s fiscal management for the comprehensive nature of its fiscal oversight.

Individuals with co-occurring severe mental illness and chemical dependency issues continue to represent the majority of candidates in need of supportive housing resources. Approximately 70% of the individuals served by HUD funded resources are in this clinical category. Many best practice models have been implemented in order to meet these challenges and improve outcome measures:

- Housing First
- Rapid Re-Housing
- Person Centered Planning
- Peer Case Management
- Home Ownership
- Street Outreach
- Employment First
- No Wrong Door Approach
- Coordinated Reentry from the Criminal Justice System
- Learning Community of Providers

The utilization of these best practice methods has produced greater access to housing while at the same time providing the opportunity for change and further growth of the individual recipient.

Access to short-term housing needs such as rental vouchers continues to be an issue in Erie County. The current Section 8 waitlist is estimated to be more than seven years. Many individuals with severe mental illness or co-occurring disorders do not require the entire service structure associated with HUD-funded supportive housing. Such individuals could benefit from immediate access to a rental voucher system to stabilize their housing needs, allowing for those in need of enriched services to obtain them in a more timely fashion.

**Priority Needs of Persons with Severe Mental Illness.** The following priority needs have been identified:

- Expand supportive housing resources
- Expand permanent housing with stipends, including increased access to Section 8 vouchers
- Support to allow individuals to stay in or maintain housing, such as flexible funding to pay the first month’s rent
- Non-licensed Single Room Occupancy Housing in partnership with local developers
- Transitional and temporary housing
- Emergency Respite Housing.

**Specific Objectives for Persons with Severe Mental Illness.** A Safe Haven housing model and program, operated through Lake Shore Behavioral Health and funded by HUD and other funding sources, is fully operational. This program
provides services to the chronically homeless and mentally ill in the community using the Housing First Model.

The recent development of 53 supported housing units, funded by the New York State Office of Mental Health in partnership with the Buffalo Psychiatric Center and Housing Options Made Easy, has produced a practice model that allows for the successful transition of long-term individuals with a length of stay at the BPC greater than 365 days into a community based on one’s housing of choice.

The Erie County Department of Mental Health has been developing plans for a One Stop Service Center that would employ all basic needs in a single location. Such services could include immediate access to housing, food, and clothing; medical attention on-site; continuous case management; and a soup kitchen with drop-in center activities. Such a delivery system would have a greater impact on the chronically homeless population while meeting the needs of other community members.

Persons with Physical Disabilities

The Erie County Office for the Disabled (ECOD) was established and became part of the Charter of the County of Erie in 1983. In 2006, the Office was moved from the Department of Health and is currently operating under the Office of Public Advocacy. Its purpose is to ensure that citizens with disabilities have a direct voice in County government and serve as an advocate to develop and enhance services for the disabled and to oversee facilities and program operated by County.

Although the ECOD does not operate specific programs, it provides assistance and information generally within three categories:

- **Referral.** The ECOD serves as a clearinghouse for information on program and services available to citizens with disabilities by Erie County and through affiliated agencies. In addition, the ECOD information network extends to include services and programs available to this constituency throughout Western New York.

- **Representation.** As the official representative of approximately 15 percent of Erie County citizens with disabilities, the ECOD provides liaison to both the County Executive’s Office and the Erie County Legislature.

- **ADA/ACCESS Oversight.** The Executive Director of the ECOD serves as the Erie County’s Compliance Officer for the Americans with Disabilities Act of 1973. This includes advising on all issues related to providing ADA-compliant access in any facility owned, operated or leased by the County as well as in programs offered by the County. Assisting in this effort are the Erie County Department of Public Works, the Division of Equal Employment Opportunity and the County Attorney’s Office.

Also assisting the ECOD is the County Charter provision for a twelve-member advisory panel, the Erie County Council on the Disabled. Membership is open to residents who have disabilities, parents of persons with disabilities, and professionals and advocates who work with individuals with disabilities.
The ECOD publishes a newsletter four times per year which often highlights services available to persons with disabilities. In 2008-09, for example, the newsletter featured articles on the Epilepsy Association of WNY, Autistic Services, and the Metro Paratransit Access Line of NFTA’s Metro-Pal Advantage, which provides curb-to-curb transportation for individuals who have a permanent or temporary disability that prevents them from using Metro’s fully-accessible fixed route bus or rail service.

As indicated above, it is estimated that 15 percent of the County population has some form of physical disability. Housing for this population varies from the range of housing occupied by the general population to institutional housing, supportive housing, group homes and single-family homes made accessible for the disabled. Many people with physical disabilities are in need of suitable, affordable housing and supportive services. As a coordinating organization, the ECOD can identify and make referrals to services that assist persons with disabilities to live more independently as well as provide a forum for housing available to persons with disabilities such as through Belmont Shelter.

An example of an organization that services persons with physical disabilities is the Olmsted Center for the Visually Impaired. It has four housing developments in Erie County, three in the City of Buffalo and one in Cheektowaga. Each development has 24 units: 20 one-bedroom and 4 two-bedroom units. They are all tax credit projects and serve tenants with income levels between 30 and 50 percent of the area median income. Olmsted Center has pursued and developed this housing on its own initiative.

**Priority Needs of Persons with Physical Disabilities.** Although the ECOD does not operate program services or provide housing, its role as a central resource within the County for advocacy, coordination and dissemination of information is no doubt critical for enabling many persons with disabilities to be able to continue to live independently. For persons with physical disabilities, information, advocacy and support services are critical resources that facilitate and assist independent living.

**Specific Objectives for Persons with Physical Disabilities.** Often the primary challenge facing individuals with disabilities is the physical limitation imposed by their living arrangements. As part of its housing goals, the Town of Tonawanda intends to assist five households in modifying or adapting their living accommodations to make their unit more handicapped accessible and/or usable. Depending on the circumstances for each household, these changes may involve exterior and/or interior modifications. An initial budget of $25,000 is included in Table 1B for this purpose subject to assessment of each individual situation.

**Housing Opportunities for People with AIDS**

*Please also refer to the HOPWA Table in the Needs.xls workbook.*

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.

4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.

6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 3 Action Plan HOPWA response:

The Town does not receive a HOPWA grant.

**Specific HOPWA Objectives**

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 3 Specific HOPWA Objectives response:

The Town does not receive a HOPWA grant.

**Other Narrative**

Include any Action Plan information that was not covered by a narrative in any other section.
## OUTCOME PERFORMANCE MEASUREMENTS

(Table 1C, 2C, 3A)

<table>
<thead>
<tr>
<th>Specific Objective</th>
<th>Source of Funds</th>
<th>Year</th>
<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DH 1.1</strong> - Acquire &amp; Demolish substandard units - Build new homes - Provide housing counseling</td>
<td>CDBG</td>
<td>2010</td>
<td>Housing units</td>
<td>40</td>
<td>131</td>
<td>328%</td>
</tr>
<tr>
<td></td>
<td>HOME</td>
<td>2011</td>
<td></td>
<td>40</td>
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<tr>
<td></td>
<td></td>
<td>2012</td>
<td></td>
<td>40</td>
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<td></td>
<td></td>
<td>2013</td>
<td></td>
<td>40</td>
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<td></td>
<td>2014</td>
<td></td>
<td>40</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>MULTI-YEAR GOAL</strong></td>
<td></td>
<td></td>
<td></td>
<td>200</td>
<td>131</td>
<td>66%</td>
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<th>Source of Funds</th>
<th>Year</th>
<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DH 2.1</strong> - Provide housing subsidy - Provide closing cost assistance - Provide weatherization services to L/M residents</td>
<td>CDBG</td>
<td>2010</td>
<td>Households Served</td>
<td>26</td>
<td>45</td>
<td>173%</td>
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<tr>
<td></td>
<td>HOME</td>
<td>2011</td>
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<td><strong>MULTI-YEAR GOAL</strong></td>
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<td>125</td>
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<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DH 3.1</strong> - Rehabilitate existing owner/renter occupied unit - Provide Code Enforcement - Remove lead based paint hazards</td>
<td>CDBG</td>
<td>2010</td>
<td>Housing Units</td>
<td>50</td>
<td>113</td>
<td>226%</td>
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<td></td>
<td></td>
<td>2011</td>
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<td>2014</td>
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<td><strong>MULTI-YEAR GOAL</strong></td>
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<td>45%</td>
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<thead>
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<th>Source of Funds</th>
<th>Year</th>
<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SL 1.1</strong> - Emergency shelters will assist runaway youth &amp; victims of domestic violence</td>
<td>ESG</td>
<td>2010</td>
<td>Persons served</td>
<td>50</td>
<td>1403</td>
<td>2806%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2011</td>
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<td>2014</td>
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<td>50</td>
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<tr>
<td><strong>MULTI-YEAR GOAL</strong></td>
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<td></td>
<td></td>
<td>250</td>
<td>1403</td>
<td>561%</td>
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<table>
<thead>
<tr>
<th>Specific Objective</th>
<th>Source of Funds</th>
<th>Year</th>
<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
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</thead>
<tbody>
<tr>
<td><strong>SL 2.1</strong></td>
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<td>2010</td>
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<td>2014</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td><strong>MULTI-YEAR GOAL</strong></td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Specific Objective</th>
<th>Source of Funds</th>
<th>Year</th>
<th>Performance Indicators</th>
<th>Expected Number</th>
<th>Actual Number</th>
<th>Percent Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SL 3.1</strong> - Youth Services-Prime Time - Crime Awareness-Community Policing - Planning</td>
<td>CDBG</td>
<td>2010</td>
<td>Persons served</td>
<td>10250</td>
<td>16,492</td>
<td>161%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2011</td>
<td></td>
<td>10250</td>
<td></td>
<td></td>
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<tr>
<td></td>
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<td>10250</td>
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<td>2013</td>
<td></td>
<td>10250</td>
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</tr>
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<td></td>
<td>2014</td>
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<td>10250</td>
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<tr>
<td><strong>MULTI-YEAR GOAL</strong></td>
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<td>51250</td>
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<td>32%</td>
</tr>
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<td>Objective</td>
<td>Year</td>
<td>Specific Objective</td>
<td>Source of Funds</td>
<td>Performance Indicators</td>
<td>Expected Number</td>
<td>Actual Number</td>
</tr>
<tr>
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<td>EO 1.1</td>
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<tr>
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<td>EO 3.1</td>
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<tr>
<td>NR 1.1</td>
<td>2010</td>
<td>Street reconstruction</td>
<td>CDBG</td>
<td>Number of streets</td>
<td>41</td>
<td>182</td>
</tr>
<tr>
<td></td>
<td>2011</td>
<td>Sidewalk installation</td>
<td></td>
<td>and sidewalks</td>
<td>41</td>
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<tr>
<td></td>
<td>2012</td>
<td>Tree planting</td>
<td></td>
<td>improved</td>
<td>40</td>
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</tr>
<tr>
<td></td>
<td>2013</td>
<td></td>
<td></td>
<td>Number of trees</td>
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<td>40</td>
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<tr>
<td>O 1.1</td>
<td>2005</td>
<td>Other</td>
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<tr>
<td>O 2.1</td>
<td>2005</td>
<td>Other</td>
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## Priority Housing Needs/Investment Plan Table

*(Table 2A)*

<table>
<thead>
<tr>
<th>Priority Need</th>
<th>5-Yr Goal Plan/Act</th>
<th>Yr. 1 Goal Plan/Act</th>
<th>Yr. 2 Goal Plan/Act</th>
<th>Yr. 3 Goal Plan/Act</th>
<th>Yr. 4 Goal Plan/Act</th>
<th>Yr. 5 Goal Plan/Act</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Renters</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0 - 30 of MFI</td>
<td>4/0</td>
<td>1/0</td>
<td>1/</td>
<td>1/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31 - 50% of MFI</td>
<td>5/2</td>
<td>1/2</td>
<td>1/</td>
<td>1/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 - 80% of MFI</td>
<td>6/2</td>
<td>1/2</td>
<td>1/</td>
<td>1/</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Owners</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0 - 30 of MFI</td>
<td>13/6</td>
<td>2/6</td>
<td>3/</td>
<td>3/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31 - 50 of MFI</td>
<td>50/11</td>
<td>10/11</td>
<td>10/</td>
<td>10/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 - 80% of MFI</td>
<td>77/18</td>
<td>15/18</td>
<td>15/</td>
<td>15/</td>
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<tr>
<td><strong>Homeless</strong></td>
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</tr>
<tr>
<td>Individuals</td>
<td>250/</td>
<td>50/1403</td>
<td>50/625</td>
<td>50/</td>
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<td>Families</td>
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<td>10/125</td>
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<tr>
<td><strong>Non-Homeless Special Needs</strong></td>
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<tr>
<td>Elderly</td>
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<tr>
<td>Frail elderly</td>
<td>10/23</td>
<td>2/12</td>
<td>2/11</td>
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<td>Severe Mental Illness</td>
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<tr>
<td>Victims of Domestic Violence</td>
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<tr>
<td><strong>Total</strong></td>
<td>459/1627</td>
<td>93/1627</td>
<td>94/</td>
<td>94/</td>
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<tr>
<td><strong>Total Section 215</strong></td>
<td>82/19</td>
<td>17/19</td>
<td>17/</td>
<td>17/</td>
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<tr>
<td>215 Renter</td>
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<td>2/2</td>
<td>2/</td>
<td>2/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>215 Owner</td>
<td>53/17</td>
<td>10/17</td>
<td>13/</td>
<td>13/</td>
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<td></td>
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</tbody>
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*Homeless individuals and families assisted with transitional and permanent housing

- Actual Numbers for Year 2 will become final as of 3/31/12.

Updated: 12/19/11
## Priority Housing Activities

(Table 2A)

<table>
<thead>
<tr>
<th>Priority Need</th>
<th>5-Yr. Goal Plan/Act</th>
<th>Yr. 1 Goal Plan/Act</th>
<th>Yr. 2 Goal Plan/Act</th>
<th>Yr. 3 Goal Plan/Act</th>
<th>Yr. 4 Goal Plan/Act</th>
<th>Yr. 5 Goal Plan/Act</th>
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<tbody>
<tr>
<td><strong>CDBG</strong></td>
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</tr>
<tr>
<td>Acquisition of existing rental units</td>
<td>50/28</td>
<td>10/28</td>
<td>10/</td>
<td>8/</td>
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<td></td>
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<tr>
<td>Production of new rental units</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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</tr>
<tr>
<td>Rehabilitation of existing rental units</td>
<td>15/4</td>
<td>3/4</td>
<td>3/</td>
<td>3/</td>
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<td>Acquisition of existing owner units</td>
<td>1/1</td>
<td>0/1</td>
<td>0/</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Production of new owner units</td>
<td>0</td>
<td>0/</td>
<td>0/</td>
<td>0/</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rehabilitation of existing owner units</td>
<td>100/20</td>
<td>20/20</td>
<td>14/</td>
<td>18/</td>
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<tr>
<td>Homeownership assistance</td>
<td>40/4</td>
<td>8/4</td>
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A-C-T HOME Consortium Activities are reported in IDIS by the Town of Amherst. Activities that are completed in the Town of Tonawanda are shown for your information only.

Actual Numbers for Year 2 will become final as of 3/31/12.

Updated: 6/3/11
<table>
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<th>Priority Need</th>
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<th>Unmet Priority Need</th>
<th>Dollars to Address Need</th>
<th>5 Yr Goal Plan/Act</th>
<th>Annual Goal Plan/Act</th>
<th>Percent Goal Completed</th>
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