

TOWN OF HAMBURG, NEW YORK

2025 “Final” Consolidated Plan
2025 “Final” Action Plan
April 1, 2025 - March 31, 2026
(2025 Program Year)



Hamburg Town Board

Supervisor Catherine A. Rybczynski
Councilman Frank M. Bogulski
Councilwoman Megan A. Comerford
Councilwoman Elizabeth C. Farrell-Lorentz
Councilman Daniel M. Kozub

Hamburg Community Development

Christopher Hull; Director
Timothy Regan; Assistant Director

Summary of 2025 CDBG Projects/Funding - Program Income - HOME Funds
2025 Final Funding

Town of Hamburg 2025 Community Development Block Grant:	\$445,160.00
Housing Renovation Conditional Grants	\$150,000.00
Town of Hamburg Infrastructure Reconstruction (Hamburg Highway)	\$140,160.00
First Time Homebuyer Conditional Grants	\$ 80,000.00
Village of Blasdell; Infrastructure Reconstruction (Salisbury Avenue)	\$ 75,000.00
2025 CDBG "Program Income":	\$100,000.00
Housing (Program Income)	\$ 25,000.00
Economic Development (Program Income)	\$ 75,000.00
TOTAL 2025 CDBG Funding:	\$545,160.00

2025 HOME Program Funds (Erie County Consortium)	Total Grant	\$152,078.00
		\$ 38,020.00
Administration (Consortium)	\$ 15,208.00	
CHDO (Consortium)	\$ 22,812.00	
Housing Renovation Conditional Grants for Income Eligible		\$114,058.00
TOTAL 2025 FUNDING (CDBG & HOME FUNDS):		\$659,218.00



Executive Summary

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

1. Introduction

The Town of Hamburg, New York is a federal entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program.

The Town of Hamburg also receives HUD Home Investment Partnerships (HOME) Program funding through their participation in the Erie County/Town of Hamburg HOME Consortium. These funds are distributed through Erie County.

As a HUD entitlement community, the Town of Hamburg is required to prepare this Five-Year Consolidated Plan (CP) for the aforementioned federal grant programs to guide funding for housing, community development and economic development activities within the Town. This CP covers the period from FY 2025 through FY 2029 (April 1, 2025 to March 31, 2029).

Purpose of the Consolidated Plan

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

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

Focus of the Plan

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

Structure of the Plan

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

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Strategic Plan provides a framework to address the needs of the Town for the next five years using CDBG and HOME funds. The three overarching objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

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

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

The overall goal of the Community Development Block Grant (CDBG) program is the development of viable urban/suburban communities that will provide decent housing, a suitable living environment and expanded economic opportunities, principally for low-to-moderate income persons. The Town of Hamburg has shifted away from making loans for housing rehabilitation programs and is now only lending for rehabilitation as part of the Mobile Home Renovation Loan Program. This shift from loans to grants through the Housing Renovation Program is reflective of the high priority the Town is putting on maintaining quality housing and housing stability for low- and moderate-income residents.

The Town also uses CDBG funds to create a suitable living environment by funding public services, especially in the wake of COVID-19. The Town of Hamburg will continue to utilize partners like Belmont Housing Services of WNY, Housing Opportunities Made Equal (HOME), the Center for Elder Law &

Justice, Neighborhood Legal Services, and Sts. Peter and Paul Outreach to provide public services to the residents of the Town.

3. Evaluation of past performance

Despite the difficulties in spending funds in a consistent and efficient manner due to COVID-19, the Town of Hamburg is administering its federal CDBG and HOME funds in an effective and compliant manner. The Town of Hamburg generally identifies and expends annual program funding within the same year it was awarded. As of January 31, 2024, the Town has achieved HUD timeliness standard.

The following provides a brief summary highlighting key achievements in the major funding categories: Community Projects, Economic Development, Housing and Continuum of Care.

Community Projects: Two (2) major projects were completed in 2023 including one each in the Village of Blasdell and one within the Town of Hamburg. Both of these projects involved infrastructure reconstruction, and specifically road reconstruction within the Village of Blasdell and the Town of Hamburg. Both projects were in HUD target areas. The road reconstruction projects benefited 5,900 low/moderate income people.

Housing: The Town of Hamburg Department of Community Development's housing programs assisted seventeen low/moderate income households in 2023. This amount seems small at first glance, but what is not stated is that eleven households assisted were with CDBG funding. Six of the households assisted were with HOME funds. The Town expended a large amount of time and money trying to spend out of HOME funding which is tied in with the Erie County HOME Consortium. This is where limitations in staffing capacity are an issue. The time and effort required to commit and expend HOME funds limits the ability to have a large impact with CDBG expenditures.

Continuum of Care: Promotes town-wide commitment to end homelessness by providing grant funds to ensure that individuals and families remain within their dwellings while other services are offered to them promoting access to and effective utilization of other mainstream programs. Nine families were assisted through this program to prevent homelessness.

Economic Development: Economic development is an important part of strengthening communities. The ability for local government to have economic development opportunities for its business community is a primary function of a healthy local economy. In this instance, the Town of Hamburg utilizes its Community Development Block Grant (CDBG) program to create and retain jobs for the community that would have otherwise not be created or retained. By working with other government entities, the local economy can be strengthened as part of a larger, regional area. The Hamburg Town Board has chosen to utilize a sub-recipient to administer its economic development program with the use of its Community Development Block Grant (CDBG) funds. The Hamburg Development Corporation (HDC) assisted one (1) business in PY 2023 for job creation/retention.

4. Summary of citizen participation process and consultation process

The Town of Hamburg is committed to having as much input and participation from its residents as it can get, especially when developing its plans, programs and activities that utilize federal funding. To this end, the Town of Hamburg Department of Community Development welcomes and openly solicits participation from its residents on all issues pertaining to its Community Development Block Grant (CDBG) program and the Home Investment Partnership (HOME) Program. In order to facilitate this participation from town residents the Town of Hamburg Department of Community Development will follow this "Citizen Participation Plan" and any future updates to said plan that are required or necessitated.

Four (4) public hearings were held during summer/fall, 2024 as part of the Consolidated Funding planning process. A summary of the specific comments per hearing is listed below:

- September 16, 2024 @ 7:00 p.m. (Hamburg Community Development)
- September 23, 2024 @ 7:00 p.m. (Hamburg Community Development)
- October 7, 2024 @ 7:00 p.m. (Hamburg Community Development)
- October 19, 2024 @ 12:00 p.m. (Hamburg Community Development)

The formal public comment period on the Draft 2025-2029 Consolidated Plan extended from January 10, 2025 to February 10, 2025. A public hearing was held on January 22, 2025 to accept comments on the draft plans. The public hearing was advertised in the Buffalo News and on the website of the Town of Hamburg Community Development.

See the Citizen Participation Appendix for all meeting summaries, comment sheets, and summary of community needs survey.

5. Summary of public comments

Comments received during the public hearings are listed by date and type below:

Monday, September 16, 2024: One person attended the public hearing to listen to the two presentations about the CDBG and HOME programs. The presentations were provided by Erie County Department of Environment and Planning and The Town of Hamburg Department of Community Development. A local television station attended the public hearing and completed a news story that night on the hearing/event. No e-mail requests were received for this hearing period.

Monday, September 23, 2024: No one attended the public hearing. Four e-mail requests were received. All four e-mails pertained to requests for childcare micro-enterprise assistance for WeeCare, Inc. dba as Upwards. (As a footnote, there was a home Buffalo Bills game that night which definitely influenced hearing attendance).

Monday, October 7, 2024: Four people attended the public hearing looking for information pertaining to fair housing and rental assistance issues. A discussion of local, county, and state fair housing laws ensued. Additionally, affordable housing pertaining to rental units within the town was discussed. Specific information and contacts were provided. Five e-mail requests were received. All five e-mails pertained to requests for childcare micro-enterprise assistance for WeeCare, Inc. dba as Upwards.

Saturday, October 19, 2024: No persons attended the public hearing, however, a representative for the firm completing the Analysis of Impediments to Fair Housing and the Five-Year Consolidated Plan was in attendance to answer any questions on the two documents. No e-mail requests were received for this hearing period.

* The nine e-mails received from various persons/e-mail addresses could not be verified as Town of Hamburg residents. Requests for information on address and/or business were sent to each e-mail submitter twice with no response from any of the nine persons claiming to have interest in Hamburg issues.

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

All comments or views were accepted.

7. Summary

In summary, the Consolidated Plan and Annual Action Plan have been developed with community input and reflect the needs of the Town of Hamburg.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Hamburg	Department of Community Development
HOME Administrator	Hamburg	Department of Environment & Planning

Table 1– Responsible Agencies

Narrative

The Town of Hamburg Office of Community Development is primarily responsible for administering programs covered by the Consolidated Plan.

Consolidated Plan Public Contact Information

Christopher Hull, Director, of Community Development

The Town of Hamburg, Department of Community Development

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

1. Introduction

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

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

During the final week of June 2024, the Town of Hamburg and the Erie County Consortium held focus groups with a large cross section of stakeholders to discuss the Five-Year Consolidated Plan and funding priorities. The outreach effort further included public meetings, notices, interviews, and a community development needs survey. In addition, the Hamburg Department of Community Development implements a range of affordable housing and community development activities, including administration of the CDBG and HOME programs; preparation of the Consolidated Plan (CP), the Consolidated Annual Performance Evaluation Report (CAPER), and the Annual Plan; technical assistance for and collaboration with non-profit and for-profit housing developers and social service agencies; and rehabilitation and other affordable housing projects.

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

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

The Town of Hamburg's Homeless Prevention Program (HPP) is funded by CDBG Program Income funds on an "as needed" basis. The goal of the HPP is to provide temporary assistance to low/moderate income persons/families that are at risk of becoming homeless or will otherwise become homeless. Financial assistance is only provided to persons/families who are the most likely to achieve and maintain

stable housing once assistance has been provided. The program aims to stabilize an existing household to the point where other, more permanent services can be provided by other service providers. The HPP provides rent arrears/short-term rental assistance and utility arrears assistance for a maximum of three months to approved, qualified households/families. As part of the Town's HPP, Hamburg Community Development works with "The Center for Elder Law & Justice" and "Neighborhood Legal Services" to provide free legal assistance to qualified residents dealing with evictions, eviction issues, or other eligible legal services.

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

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

The chief obstacle to meeting underserved needs is a lack of or inadequate, resources - both financial and human (staffing). The Town of Hamburg will continue to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the service needs of its residents. The Town of Hamburg will support the efforts of service agencies in Erie County to maximize the use of available resources and to obtain additional resources whenever possible. The Town of Hamburg does not receive ESG funds.

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

Table 2– Agencies, groups, organizations who participated

1	Agency/Group/Organization	AMERICAN RED CROSS
	Agency/Group/Organization Type	Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
2	Agency/Group/Organization	Belmont Housing Resources for WNY, Inc.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
3	Agency/Group/Organization	Buffalo Municipal Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
4	Agency/Group/Organization	Center for Elder Law and Justice
	Agency/Group/Organization Type	Service - Legal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
5	Agency/Group/Organization	HOMELESS ALLIANCE OF WESTERN NEW YORK
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
6	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
7	Agency/Group/Organization	Legal Aid Bureau of Buffalo, Inc.
	Agency/Group/Organization Type	Service - Legal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
8	Agency/Group/Organization	Neighborhood Legal Services
	Agency/Group/Organization Type	Service - Legal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
9	Agency/Group/Organization	Office for People with Developmental Disabilities
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
10	Agency/Group/Organization	People Inc.
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
11	Agency/Group/Organization	Rental Assistance Corporation of Buffalo
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
12	Agency/Group/Organization	WNY Office of People with Developmental Disabilities
	Agency/Group/Organization Type	Services-Persons with Disabilities

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
13	Agency/Group/Organization	Saints Peter and Paul Parish Outreach and Food Pantry
	Agency/Group/Organization Type	Food Pantry
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		
2024 Hamburg Annual Action Plan	Town of Hamburg	Goals of the Strategic Plan relate to previous years efforts, adjusting based on previous outcomes to maximize benefit of CDBG and HOME investments
2023 Town of Hamburg Consolidated Annual Performan	Town of Hamburg	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Hamburg.
Town of Hamburg Comprehensive Plan - 2022	Town of Hamburg	Strategic Plan goals and priorities were created to align with the overall vision and land use pattern of the Town of Hamburg.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2017 Erie County Broadband Feasibility Study	Erie County	The Strategic Plan advances the recommendations of the broadband study.
ErieNET Business Plan Preliminary Draft (2022)	Erie County	The Strategic Plan advances the recommendations of the business plan.
FY2023 Homelessness Summary Brief	Homeless Alliance of Western New York	The Strategic Plan’s homelessness strategy was developed consistent with the data presented within.

Table 3– Other local / regional / federal planning efforts

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

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

Narrative

The Town of Hamburg continues to strive to include community agencies in the development and planning process for the Consolidated Plan and Action Plan implementation. The County has on-going efforts to increase coordination and consultation efforts in its planning processes.

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

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

The development of the Erie County Urban Consortium / Town of Hamburg 2025-2029 Consolidated Plan involved a variety of public outreach activities designed to gather public input and comment regarding implementation of CDBG, HOME and ESG Programs. The citizen participation process allowed the Town an opportunity to better inform the public of the purposes of these programs, the funding allocation process, and to be better aware of the needs of low-and moderate-income citizens.

In June 2024 staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation. More than 250 individual and organizational stakeholders were invited to participate in seven stakeholder meetings involving: Planning and Zoning and Municipal Officials, Public Housing Authorities, Community-based Organizations (CBOs) and Community Housing Development Organizations (CHDOs), Affordable and Special Needs Housing Organizations, Homeless Assistance Providers, Regional Agencies, Health and Human Services Agencies, Lead-Based Paint Agencies, Business Associations, Persons with Disability Advocacy Organizations, Persons with Limited English Proficiency Advocacy Organizations, Fair Housing Organizations, Non-profit Housing Owners, For-profit Housing Owners, Property Managers, Broadband Agencies, Resilience and Emergency Management Agencies, and Real Estate Developers.

The Town of Hamburg Department of Community Development held four public hearings which allowed for public comments and questions about Town programs. The Town's goal for citizen participation is to ensure broad participation of its residents; housing, economic development, and other service providers; local departments; nonprofit organizations; neighborhood groups; and other stakeholders in the planning and implementation of community development and housing programs. As such, the Town has laid out a Citizen Participation Plan (CPP) to broaden citizen participation.

The formal public comment period on the Draft 2025-2029 Consolidated Plan extended from January 10 to February 10, 2025. A public hearing was held on January 22, 2025 to accept comments on the draft. The hearings were advertised in the Buffalo News and also posted on the Town of Hamburg Community Development's website.

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

funds. See the Citizen Participation Appendix for all sign-in sheets, meeting summaries, comment sheets, and summary of community needs survey. Comments received were a part of the Needs Assessment and Market Analysis, and ultimately helped shape the outcome of the Plan's Five-Year Goals and Objectives.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Stakeholder Meeting	Regional Agencies and Economic Development	A stakeholder meeting was held on June 25, 2024 at 10:00 am at the Delavan Grider Community Center. Representatives of nine agencies attended.	Infrastructure is aging and in need of updates. Public transportation and internet access are a concern in rural communities. Lack of new starter homes, not profitable enough to build. Need more public/private partnerships.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Stakeholder Meeting	Homelessness and Special Needs Housing	A stakeholder meeting was held on June 25, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 26 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing capacity. Strengthen supportive services. Address regulatory issues that prevent shelters and affordable housing from being built.	All comments were accepted.	
3	Stakeholder Meeting	CHDOs and CBDOs	A stakeholder meeting was held on June 26, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Enhance community engagement. Encourage banks to be more supportive and flexible in their housing loan qualification process. Improve homebuyer training. Explore modular housing to address need for affordable and efficient housing solutions. Assess the financial impact of the 2027 electric mandate.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Stakeholder Meeting	Health and Human Services	A stakeholder meeting was held on June 26, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Address affordable housing shortage. Add shelter and transitional housing in general as well as for DV victims. Address language barriers. Increase services for school age children. Increase funding to nonprofits. Address transportation needs.	All comments were accepted.	
5	Stakeholder Meeting	Housing Authorities, Developers, and Property Owners/Managers	A stakeholder meeting was held on June 27, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of 12 agencies attended.	Increase shelter capacity. Develop transition programs. Enhance homebuyer education. Address affordable housing. Improve public housing sustainability. Strengthen supportive services. Monitor rental market. Enhance maintenance and security. Focus on needs of rural communities.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6	Stakeholder Meeting	Advocacy and Fair Housing Organizations	A stakeholder meeting was held on June 27, 2024, at 1:00 pm at the Delavan Grider Community Center. Representatives of 10 agencies attended.	Increase education programs on fair housing laws. Increase enforcement of fair housing laws. Address affordable housing.	All comments were accepted.	
7	Stakeholder Meeting	Resilience and Emergency Management	A stakeholder meeting was held on June 28, 2024, at 10:00 am at the Delavan Grider Community Center. Representatives of three agencies attended.	Weatherization programs and emergency roof repair programs becoming increasingly important in response to weather volatility. Need to continually support and grow warming and cooling stations. Coordination of agencies is imperative. Invest in improved connectivity through broadband investment.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
8	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Four (4) public hearings were conducted.	<p>The Town of Hamburg held four public hearings pertaining to the 2025 Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. All public hearings were held at 6122 South Park Avenue, offices of Hamburg Community Development. Public hearings were held on the following dates/times: Monday, September 16, 2024 - 7:00 p.m. One person attended the public hearing to listen to the two presentations about the CDBG and HOME programs. The presentations were provided by Erie County Department of Environment and Planning and The Town of Hamburg Department of Community Development. A local television station attended the public hearing and completed a news story that night on the hearing/event. No e-mail requests were received for this hearing period. Monday, September 23, 2024 - 7:00 p.m. No one attended the public hearing. Four e-mail requests were received. All four e-mails pertained to requests for child care micro-enterprise assistance for</p>	All comments were accepted.	
OMB Control No: 2506-0117 (exp. 09/30/2021)	Consolidated Plan		Hamburg		19	

WacoCare Inc dba as Inwardc /Ac a

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
9	Newspaper Ad	All community residents	Notice of availability of the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan for public review and comment was published in the Buffalo News on January 10, 2025.	No comments were received		
10	Internet Outreach	All community residents	The FY 2025-FY 2029 Consolidated Plan and FY 2025 Annual Action Plan were posted on the Towns website on January 10, 2025.	No comments were received		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
11	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Hamburg held a public hearing on January 22, 2025 to present and obtain comments on the FY 2025-FY 2029 Consolidated Plan and the FY 2025 Annual Action Plan.	No comments were received		

Table 4-- Citizen Participation Outreach

Needs Assessment

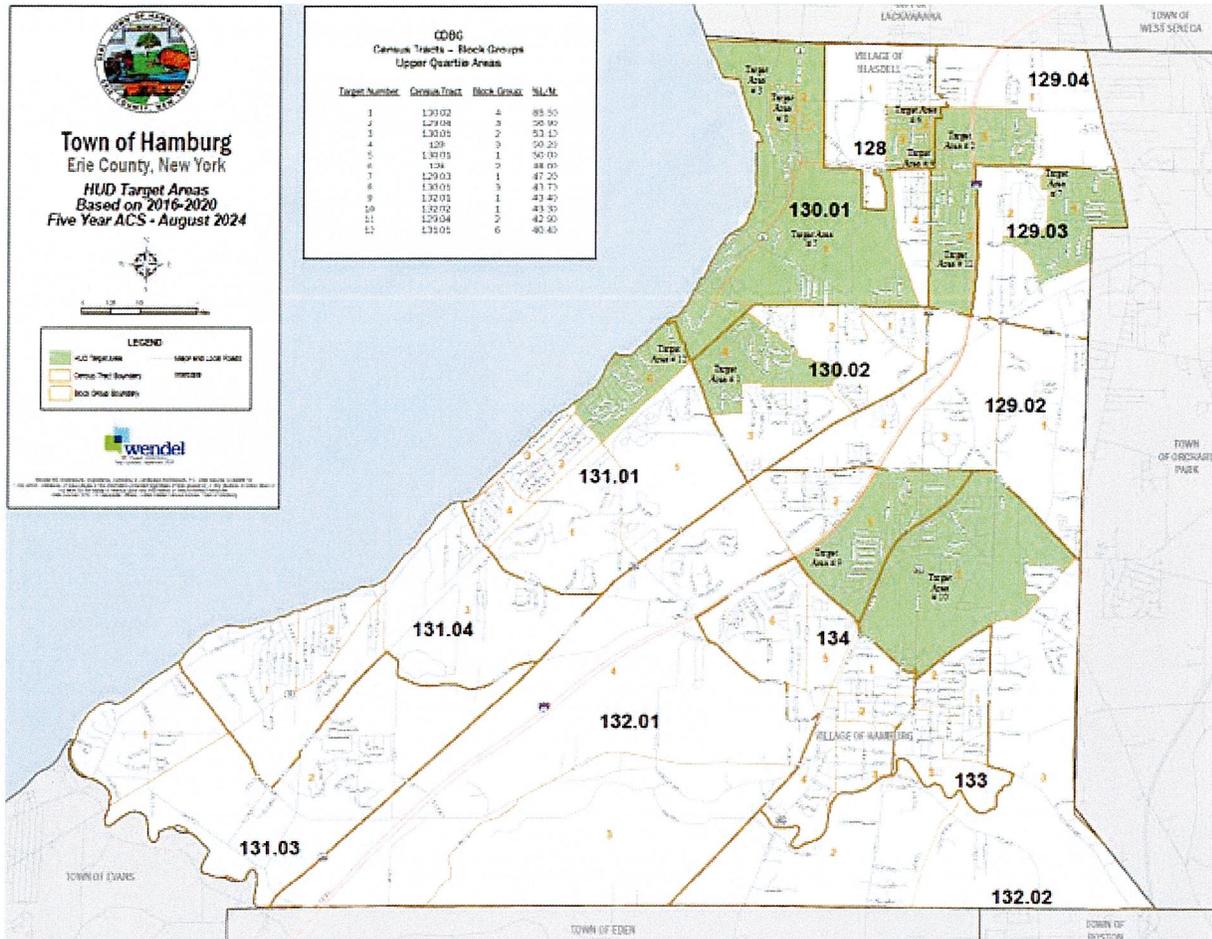
NA-05 Overview

Needs Assessment Overview

The Town of Hamburg is a HUD entitlement community and a member of the Erie County HOME Consortium of which the Erie County is the lead grantee. Since the Town is an entitlement grantee and receives funding independent of the County, a separate Needs Assessment and NA-50 Non-Housing Community Development Needs are presented as specific to the Town of Hamburg.

The needs assessment is based on an analysis of housing problems by income level among renters and owners, as well as households with special needs. Additionally, needs were identified through a comprehensive public outreach process that included stakeholder consultation, public hearings and a review process designed to meaningfully engage citizens.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set (2016-2020), which is a special tabulation of American Community Survey (ACS) data from the Census Bureau, as well as 2016-2020 ACS data updated in August 2024. CPD Maps were created to show the geographic distribution and concentration of cost burdened households based on the most recent CHAS data. The map of Hamburg shows Census tracts by number. Areas shaded in green shows designated Community Development target areas within selected Census tracts. There has been significant movement in terms of eligible block groups and resultant target areas from the last Consolidated Plan (further defined in SA-10 Geographic Priorities) and the following map reflects the most recent data. There is better distribution of eligible target areas than in recent years, however most of the target areas are still located in the northern part of the town, along the border with Lackawanna and including the older Village of Blasdell as reflected in the HUD Target Area Map on the following page.

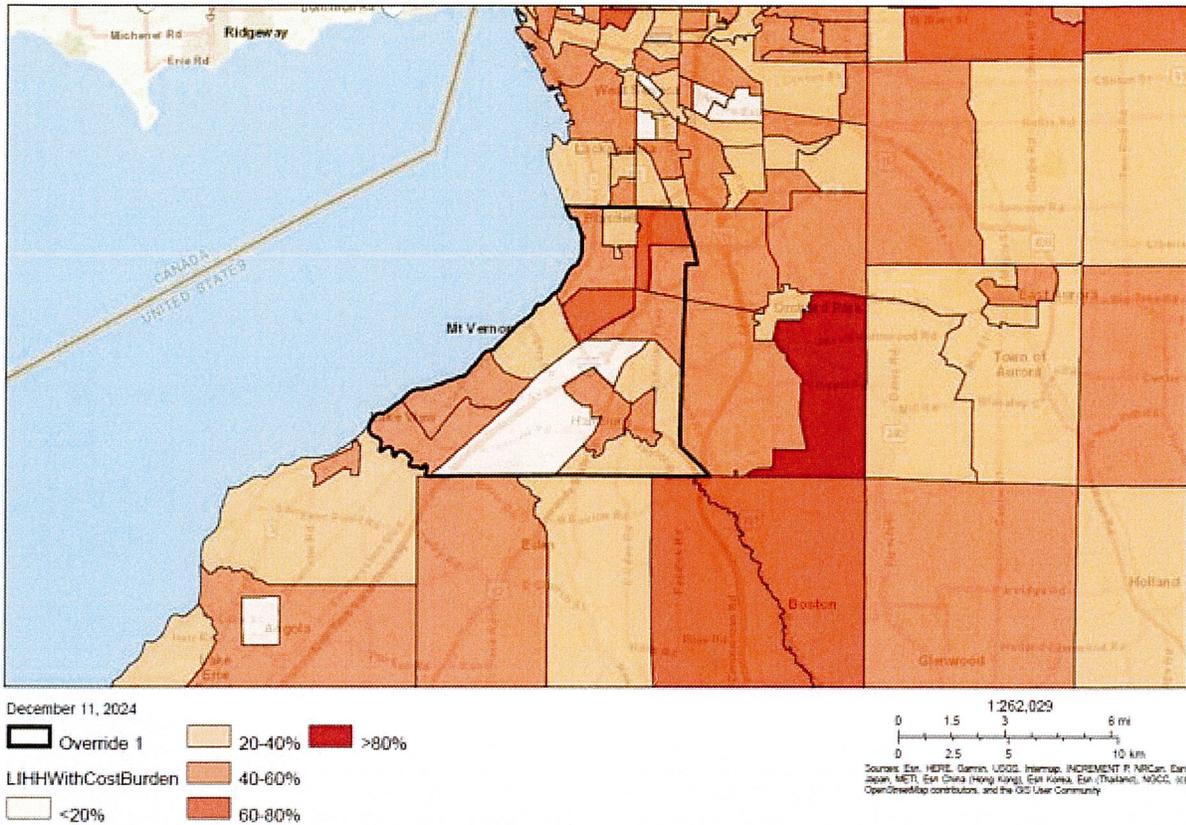


Map Town of Hamburg Target Areas

Cost Burden Text

Cost burden is categorized by “HUD Adjusted Median Family Income”, or HAMFI, which refers to the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs. HUD defines housing cost burden as paying more than 30% of household income for housing. As cited under MA-05 Market overview, 42.9% of all renters in the Town of Hamburg have a housing cost which is equal to 30 % of more of their income. For homeowners, up approximately 2.5% from 2019 which is unsurprising and actually reasonable in this regional housing market. The following map shows the largest concentrations of cost burdened households in Hamburg are in Census tracts 128 and 130.01 both of which contain HUD Community Development target areas.

Town of Hamburg - % of LI Households with Severe Cost Burden

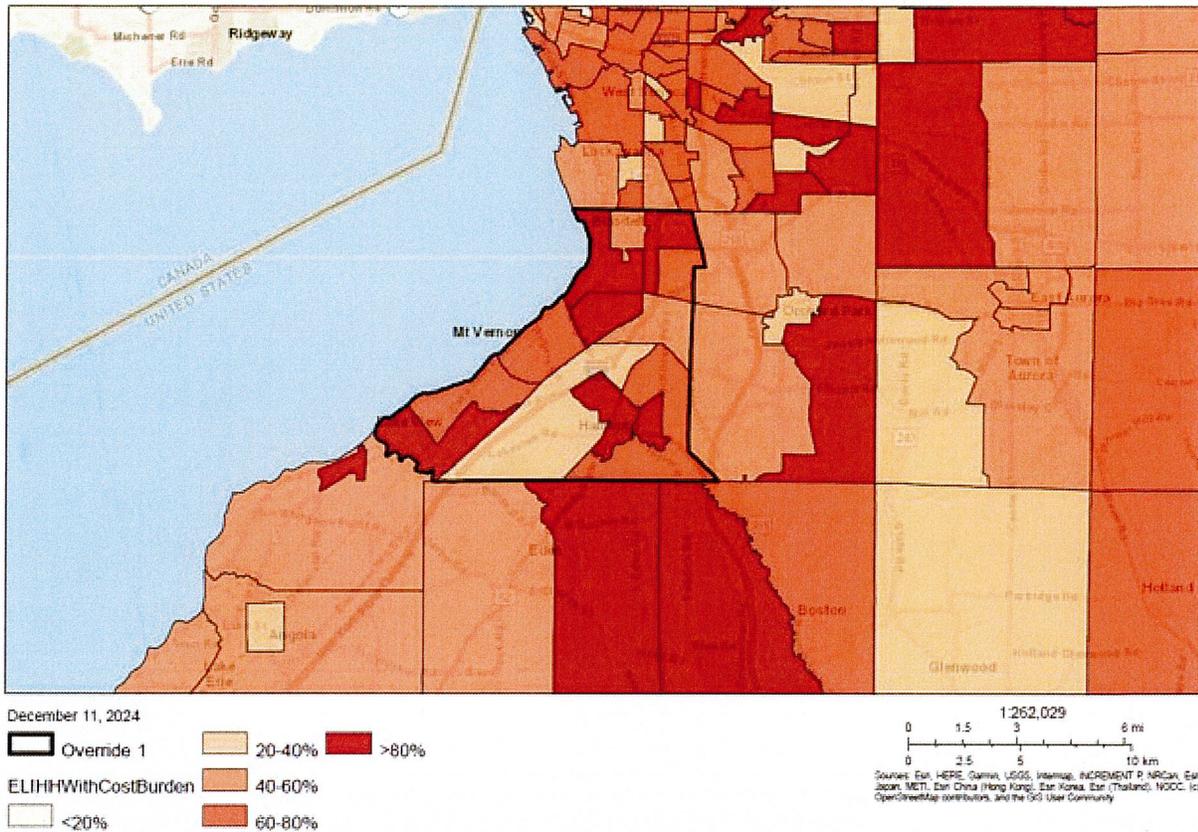


Map Town of Hamburg % of LI Households with Severe Cost Burden

ELI Households with Severe Cost Burden

The map below shows the percent of extremely low-income households, those having a housing cost in excess of 50% of income, tracts with severe cost burden, which means having an income below 30% of the median income. It is important to note that when looking at extremely low income, the sever cost burden is much more widely disbursed throughout the Town. This stands to reason, while underscoring the fact that extremely low income individuals reside throughout the Town and impact almost every neighborhood in the Town and the region.

Town of Hamburg - % of ELI Households with Severe Cost Burden

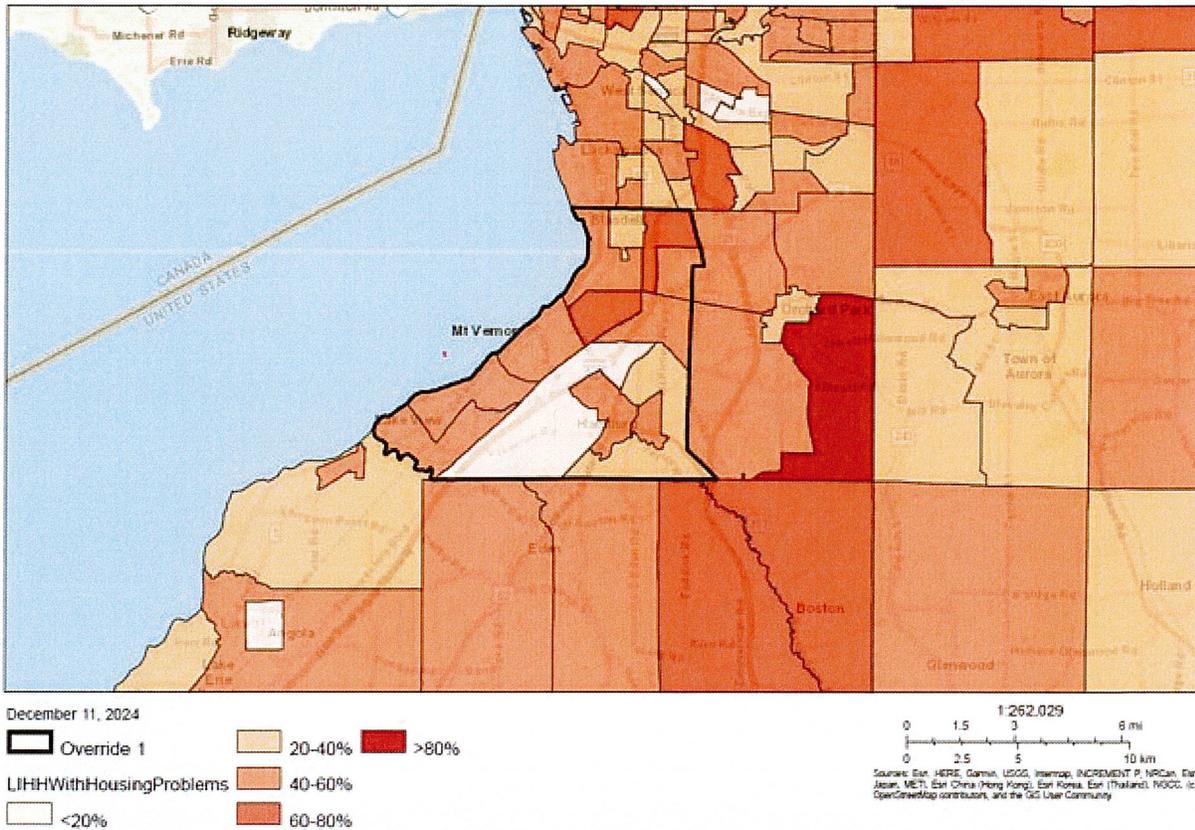


Map Town of Hamburg % of ELI Households with Severe Cost Burden

LI Households with Any of 4 Severe Housing Problems

The percent of low-income households, those with an income below 80% of the median, with any of four severe housing problems (lacks complete plumbing, lacks complete kitchen facilities, severe overcrowding and housing cost in excess of 50% of income) is shown in the map below. The largest concentration is Census tracts 128, 130.01, and 130.02. This remains consistent with expectations in the Village of Blasdell and the northern portion of the Town, adjacent to Lackawanna, one of the lowest income municipalities in the Erie County Consortium.

Town of Hamburg - % of LI Households with Any of 4 Severe Housing Problems

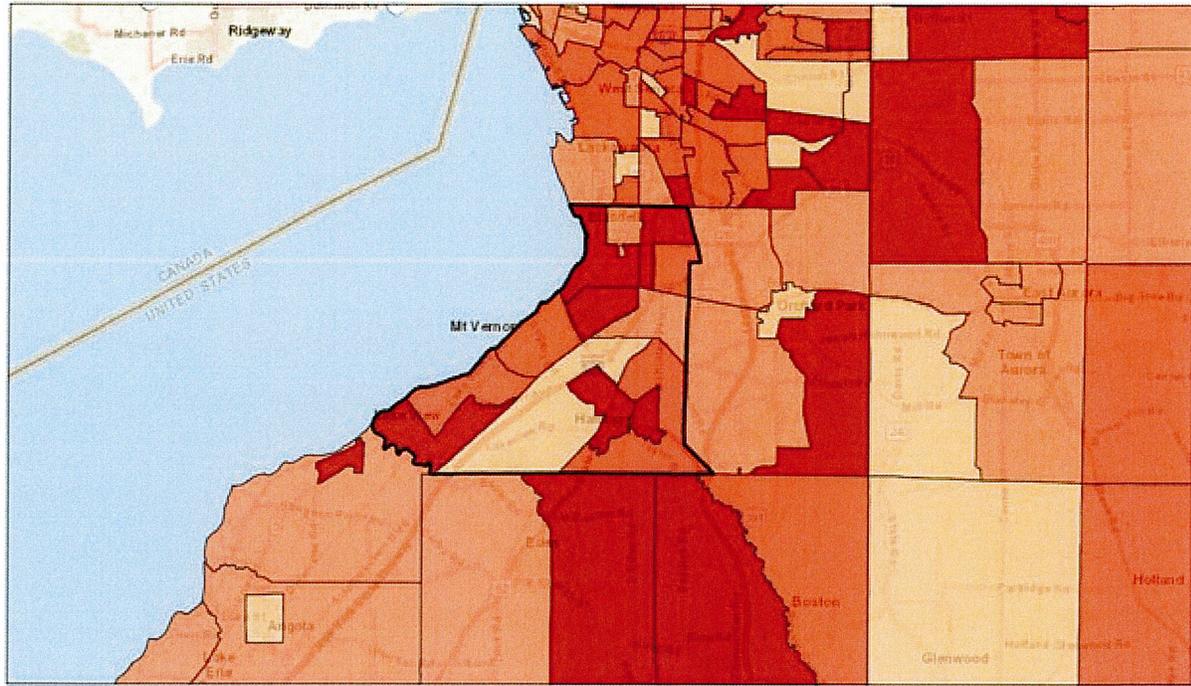


Map Town of Hamburg % of LI Households with any 4 Severe Housing Problems

ELI Households with Any of 4 Severe Housing Problems

The percent of extremely low-income households, those with an income below 50% of the median, with any of four severe housing problems (lacks complete plumbing, lacks complete kitchen facilities, severe overcrowding and housing cost in excess of 30% of income) is shown in the map below. It is important to note that when looking at extremely low income, the severe cost burden is much more widely disbursed throughout the Town. This stands to reason, while underscoring the fact that extremely low-income individuals reside throughout the Town and impact almost every neighborhood in the Town and the region.

Town of Hamburg - % of ELI Households with Any of 4 Severe Housing Problems



Map Town of Hamburg % of ELI Households with any 4 Severe Housing Problems

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

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

Describe the jurisdiction's need for Public Facilities:

The Town of Hamburg is focusing largely on housing, public services, infrastructure and economic development but has made public facility improvements that may include handicapped accessibility improvements and other enhancements and may continue to do so.

How were these needs determined?

The market and community need for housing assistance, homelessness prevention, infrastructure improvements and provision of services to Town residents are priorities and there is not enough federal money to adequately invest in those needs. COVID-19 was a large factor in reinforcing these priorities.

Describe the jurisdiction's need for Public Improvements:

During the 2025-2029 Consolidated Plan period, the Town of Hamburg and the Villages of Blasdell and Hamburg will continue to target and expend funds for infrastructure projects. Such projects are expected to include waterlines, street repaving, drainage improvements and other types of infrastructure improvements. In 2023 Hamburg completed major road reconstruction in the Villages and were able to benefit 5,900 low and moderate income residents.

How were these needs determined?

The Town of Hamburg's Public Works Department evaluates the condition of the Town's infrastructure and recommends needed improvements. The Villages of Blasdell and Hamburg also identify needed infrastructure improvements in a similar manner as they did for the 2023 projects. The Town Board has the final say on specific projects, but all three municipalities also receive requests from citizens for public improvements via public meetings and letters and all proposed projects go through a public process.

Describe the jurisdiction's need for Public Services:

COVID-19 only increased the need to provide public services to the residents of Hamburg. The Town of Hamburg partners with providers such as:

- Belmont Housing Resources for WNY
- Center for Elder Law & Justice
- Housing Opportunities Made Equal

- St. Peter & Paul Parish Outreach & Food Pantry
- Neighborhood Legal Services, Inc.
- Hamburg Development Corporation
- Western New York Law Center

Services provided include legal and eviction prevention services to combat the addition of new members to the homeless population; budget, credit and debt counseling; foreclosure prevention counseling and services; Fair Housing counseling and landlord/tenant counseling; assistance to victims of domestic violence; senior services; and loans to for-profit businesses for job creation and/or retention purposes.

How were these needs determined?

These needs were identified by the Town of Hamburg’s desire to continue established public services and the increasing need to keep residents from being displaced from their living arrangements wherever possible, to create employment opportunities in close proximity to residents, and to combat poverty by assisting with many of the basic goods and services there are getting harder to afford.

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

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

As a member of the Erie County HOME Consortium, the Town of Hamburg is not required to submit a separate housing market analysis as a component of the five-year Consolidated Plan. This document supplements the Consolidated Plan by providing an overview of the Hamburg information that will assist the Town in its local planning efforts during the next five years.

The Town of Hamburg's population as of 2023 is estimated at 59,986 by the American Community Survey and this figure has remained incredibly consistent over the last two decades. The population age 65 and over comprises 21.2% of the population so the needs of seniors are an important factor in community planning and municipal services.

Review of year-built data shows that the Town of Hamburg was a typical post-World War II suburb with its largest growth taking place in the late 1940's and the 1950's. Moderate growth occurred during each subsequent decade. Based on ACS data, the number of occupied units in the Town of Hamburg as of 2022 is 26,144. Owner occupied units totaled 19,171, representing 73.3% of the occupied units. There were 6,973 rental units, 26.7% of the occupied units.

Single family detached structures dominate the owner-occupied housing supply. Nearly nine out of every ten owner occupied units are single detached units. Multifamily structures containing 5 or more units predominates the rental supply. 52.7% of the number of rental units are in structures of five or more units up from 44% since 2015. Another 31.7% were in structures with 2 to 4 units and 13.6% were in single family detached and attached structures.

Vacancy data available indicates overall rental supply is in balance as of the time of the report. The estimated 245 vacant units represents 3.5% of the rental inventory in what is a very tight regional and national rental market. Housing for sale represent less than one-half percent of the owner-occupied inventory.

Based on 2022 ACS data, Median contract rent was \$926 (up a significant 36% from 2015 data) and median gross rent was up 30% at \$1,007

ACS data indicates that median value of homes in Hamburg in 2022 was \$216,900, up a staggering 49%. Costs have only increased in recent years, as have interest rates and the costs associated with financing housing, so these numbers likely do not fully reflect the rapid increase in housing costs in the Town.

Median household income for Hamburg is \$78,794, a 32% increase from 2015. According to the household income table, 30.6% of the households have an income below \$50,000. 28.6% have an income between \$50,000 and \$99,999.

The overall picture in the Town of Hamburg is one of increasing incomes, but even more rapidly increasing costs of housing. The disparity is not nearly as significant as many communities in the region, yet it does increase potential costs burdens associated with housing.

The Town of Hamburg currently has just over 800 units of assisted housing, including approximately 600 senior units and while there has been some talk of a short-term moratorium on housing development, the community is seeing quite a bit of activity bringing new affordable and senior housing on-line to meet this growing demand. The HOME Consortium has supported the development of Oakwood Senior Apartments that opened in 2022 and included seven set-aside units for seniors and frail elderly as well as the Juniper Apartment project that recently broke ground and will bring 65 new affordable apartments to market. Additionally, Riley Brook is a new development located near the town senior center and Frontier School buildings that is bringing 70 new income-eligible one, two, and three – bedroom units on-line.

Year Built	Owner	Renter
2020 or later	0	16
2010-2019	1,180	917
2000-2009	1,742	255
1980-1999	3,741	1,255
1960-1979	4,189	2,352
1940-1959	5,430	937
1939 or earlier	2,889	1,241
Total	19,171	6,973

Table 5 – Housing Supply
Source: 2022 ACS Five Year Estimates

Table 5 Housing Supply

Category	Owner		Renter	
	Count	Percentage	Count	Percentage
1-detached	17,151	89.5%	790	11.3%
1-attached	622	3.2%	161	2.3%
2 apartments	617	3.2%	1,416	20.3%
3 or 4 apartments	100	0.5%	818	11.7%
5 to 9 apartments	0	0.0%	1,689	24.2%
10 or more apartments	20	0.1%	1,988	28.5%
Mobile Home, RV	661	3.4%	111	1.6%
Total	19,171	100.00%	6,973	100.00%

Table 6 – Number of Units in Structure

Source: 2022 ACS Five Year Estimates

Table 6 Housing Units in Structure

	Units
For rent	245
Rented, not occupied	96
For sale only	109
Sold, not occupied	58
For seasonal, recreational, or occasional use	299
For migrant workers	0
Other vacant	169
Total	976

Table 7 – Vacant Units

Source: 2022 ACS Five Year Estimates

Table 7 Vacant Units

Rent Range	Contract Rent		Gross Rent	
	Count	Percentage	Count	Percentage
Less than \$500	809	12.0%	646	9.6%
\$500-999	3,369	50.1%	2,669	39.7%
\$1,000-1,499	2,227	33.1%	2,823	42.0%
\$1,500-1,999	264	3.9%	501	7.4%
\$2,000-2,499	56	0.8%	72	1.1%
\$2,500-2,999	0	0.0%	14	0.2%
\$3,000 or more	0	0.0%	0	0.0%
Total	6,725	100.00%	6,725	100.00%
Median rent	\$926		\$1,007	

Table 8 – Contract and Gross Rent

Source: 2022 ACS Five Year Estimates

Table 8 Contract and Gross Rent

Range of owner-occupied unit value	Number	Percent
Less than \$50,000	892	4.7%
\$50,000-99,999	821	4.3%
\$100,000-149,999	2,445	12.8%
\$150,000-199,999	4,251	22.2%
\$200,000-299,999	6,358	33.2%
\$300,000-499,999	3,853	20.1%
\$500,000-999,999	407	2.1%
\$1,000,000 or more	144	0.8%
Total	19,171	100.00%
Median value	\$216,900	

Table 9 – Value of Owner-Occupied Units

Source: 2022 ACS Five Year Estimates

Table 9 Value of Owner Occupied Units

Income Range	Percent
Under \$10,000	3.1%
\$10,000-14,999	3.0%
\$15,000-\$24,999	5.7%
\$25,000-\$34,999	7.6%
\$35,000-49,999	11.2%
\$50,000-\$74,999	17.0%
\$75,000-99,999	11.6%
\$100,000-149,999	20.5%
\$150,000-199,999	12.5%
\$200,000 or more	7.8%
Total	100
Household median income	\$78,794

Table 10 – Income for Households in Hamburg

Source: 2022 ACS Five Year Estimates

Table 10 Household Income

Cost Burden and Condition of Housing

The gross rent to income table reflects cost burden data. A total of 42.9% of renters pay 30% or more of their income for rent. Moreover, within that category 37.4% of renter household pay 35% or more of their income for rent (up 5% from 2017). As shown previously, the median contract rent in Hamburg is estimated at \$926 and the gross rent is rent is \$1,007.

For homeowners without a mortgage, 12.8% have a housing cost which is 30% or more of income. For homeowners with a mortgage, 26.6% have a housing cost which is 30% or more of income.

When the number of homeowners with a mortgage and those without a mortgage are combined, a total of 3,020 households or 15.8% of all homeowners have a housing cost which is equal to 30% or more of their income.

There is clearly a significant, albeit common disparity between the cost burden on renters in the Town versus the cost burden on homeowners. Public policy should take this into account when looking at housing insecurity.

There are 8,247 households living alone and these households represent 31.5% of all households living in Hamburg. Of the 4,119 elderly households living alone, 57.1% are female. It is likely that a significant proportion of these households are among those households who are cost burdened and have a housing cost which is 30% or more of their income, whether as renters or homeowners.

	Number	Percent
Less than 15.0%	1,071	16.1%
15.0 to 19.9%	915	13.7%
20.0 to 24.9%	1,019	15.3%
25.0 to 29.9%	792	11.9%
30.0 to 34.9%	369	5.5%
35.0% or more	2,494	37.4%
Total	6,660	100.0%

Table 11 – Gross Rent as Percentage of Income

Source: 2022 ACS Five Year Estimates

Table 11 Gross Rent as percentage of Income

Percent of Income	With Mortgage		Without Mortgage	
	Number	Percent	Number	Percent
Less than 10.0%	1,027	13.4%	3,272	42.7%
10.0 to 14.9%	2,894	37.7%	1,455	19.0%
15.0 to 19.9%	3052	39.8%	797	10.4%
20.0 to 24.9%	1353	17.6%	734	9.6%
25.0 to 29.9%	1059	13.8%	430	5.6%
30.0 to 34.9%	500	6.5%	205	2.7%
35.0 to 39.9%	427	5.6%	238	3.1%
40.0 to 49.9%	386	5.0%	210	2.7%
50.0% or more	725	9.5%	329	4.3%
Total	11,423	100.00%	7,670	100.00%

Table 12 – Housing Costs for Owners without Mortgage

Source: 2022 ACS Five Year Estimates

Table 12 Housing Costs for Owners without Mortgage

	Total		Male		Female	
Households living alone - nonelderly	4,128	50.1%	1,856	62.9%	2,272	42.9%
Households living alone - 65+	4,119	49.9%	1,094	37.1%	3,025	57.1%
Households living alone - total	8,247	100.0%	2,950	100.0%	5,297	100.0%

Table 13 – Households Living Alone

Source: 2022 ACS Five Year Estimates

Table 13 Households Living Alone

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

Introduction

In determining priorities for the allocation of federal funds, the Town of Hamburg recognizes the need to foster a competitive local economy that expands economic opportunities for present and future residents. This section describes the local workforce, the nature of current employment, and activities that coordinate economic development efforts among local and regional agencies.

Economic Development Market Analysis

As of 2024, economic indicators suggest that the Town of Hamburg is performing slightly ahead of Erie County as a whole, New York State, and the nation. The unemployment rate has steadily stayed below 4% in recent years and the educational attainment of Hamburg's workforce outpaces the region. Hamburg has also experienced a growth in the total number of jobs. The number of jobs reflected in the table below (22,600) represents an increase of almost 20% over the number of jobs in the Town reflected in the 2011-2015 ACS. As shown in the table below, significant job growth was also seen in the Professional, Scientific, Management Services, Retail Trade, and the Other Services category.

A 2022 update to the Town's Comprehensive Plan spoke to protecting the diverse economic base that includes a variety of retail, commercial and industrial offerings and note the Town's economic base also benefits from industrial uses, including the Ford Stamping Plant, the Lake Erie Commerce Park, and Ravenwood North Industrial Park. Other assets that were highlighted as supporting economic activity include the Hamburg Fairgrounds and Gaming on South Park Avenue and the Town's waterfront/tourism resources along the Lake Erie shoreline.

The Hamburg Development Companies, which include the Hamburg Development Corporation and the Hamburg Industrial Development Agency, have an overall mission to stimulate economic development within the Town of Hamburg. These entities market the Town to potential businesses, companies, and investors and currently have multiple projects underway supporting the Town's economic development.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	0	0	0	0	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Arts, Entertainment, Accommodations	0	0	0	0	0
Construction	0	0	0	0	0
Education and Health Care Services	0	0	0	0	0
Finance, Insurance, and Real Estate	0	0	0	0	0
Information	0	0	0	0	0
Manufacturing	0	0	0	0	0
Other Services	0	0	0	0	0
Professional, Scientific, Management Services	0	0	0	0	0
Public Administration	0	0	0	0	0
Retail Trade	0	0	0	0	0
Transportation and Warehousing	0	0	0	0	0
Wholesale Trade	0	0	0	0	0
Total	0	0	--	--	--

Table 5 - Business Activity

Data Source Comments:

Business by Sector	# Workers	# Jobs	% Workers	% Jobs	Jobs Less Workers %
Agriculture, Mining, Oil & Gas Extraction	167	67	1%	0%	0%
Arts, Entertainment, Accommodations	2,708	3,492	9%	15%	7%
Construction	1,608	768	5%	3%	-2%
Education and Health Care Services	8,365	4,116	27%	18%	-9%
Finance, Insurance, and Real Estate	2,797	551	9%	2%	-7%
Information	498	127	2%	1%	-1%
Manufacturing	2,915	1,734	10%	8%	-2%
Other Services	1,028	1,009	3%	4%	1%
Professional, Scientific, Management Services	2,387	2,288	8%	10%	2%
Public Administration	1,663	857	5%	4%	-2%
Retail Trade	3,692	6,152	12%	27%	15%
Transportation and Warehousing	1,845	851	6%	4%	-2%
Wholesale Trade	913	588	3%	3%	0%
Total	30,586	22,600			

Table 14 – Business Activity
Source: 2022 ACS 5 Year Estimates (workers), 2022 Longitudinal Employer-Household Dynamics (All Jobs)

Table 14 Business Activity

Labor Force

Total Population in the Civilian Labor Force	0
Civilian Employed Population 16 years and over	0
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

Table 6 - Labor Force

Data Source Comments:

Labor Force	
Total Population in the Civilian Labor Force	32,094
Civilian Employed Population 16 years and over	30,586
Unemployment Rate	4.5%
Unemployment Rate for Ages 16 to 19	11.2%
Unemployment Rate for Ages 20 to 24	4.2%
Unemployment Rate for Ages 25 to 29	7.9%
Unemployment Rate for Ages 30 to 34	30.0%
Unemployment Rate for Ages 35 to 44	3.9%
Unemployment Rate for Ages 45 to 54	3.4%
Unemployment Rate for Ages 55 to 59	7.0%
Unemployment Rate for Ages 60 to 64	4.0%
Unemployment Rate for Ages 65 to 74	5.4%
Unemployment Rate for Ages 75 and over	3.4%

Table 15 – Labor Force – Unemployment by Age

Source: 2022 ACS 5 Year Estimates

Table 15 Labor Force

Occupations by Sector	Number of People
Management, business and financial	0
Farming, fisheries and forestry occupations	0
Service	0
Sales and office	0
Construction, extraction, maintenance and repair	0
Production, transportation and material moving	0

Table 7 – Occupations by Sector

Data Source Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	0	0%
30-59 Minutes	0	0%
60 or More Minutes	0	0%
Total	0	0%

Table 8 - Travel Time

Data Source Comments:

Travel Time	Number	Percentage
< 30 Minutes	312,473	76.2%
30-59 Minutes	81,604	19.9%
60 or More Minutes	15,993	3.9%
Total	410,070	100%

Table 16 - Travel Time to Work
Source: 2022 ACS 5 Year Estimates

Table 16 Travel Time to Work

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	0	0	0
High school graduate (includes equivalency)	0	0	0
Some college or Associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

Table 9 - Educational Attainment by Employment Status

Data Source Comments:

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	348	68	584
High school graduate (includes equivalency)	4,890	319	1,577
Some college or Associate's degree	8,786	403	1,633
Bachelor's degree or higher	10,632	283	1,345

Table 17 – Educational Attainment by Employment

Source: 2022 ACS 5 Year Estimates

Table 17 Educational Attainment by Employment

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

Table 10 - Educational Attainment by Age

Data Source Comments:

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	36	160	73	143	172
9th to 12th grade, no diploma	242	166	97	343	806
High school graduate, GED, or alternative	1,005	1,250	1,342	4,030	3,941
Some college, no degree	1,919	1,270	1,329	3,323	1,985
Associate's degree	280	1,190	800	2,926	2,131
Bachelor's degree	534	1,863	2,046	3,837	1,918
Graduate or professional degree	142	956	1,323	2,590	1,771

Table 18 – Educational Attainment by Age

Source: 2022 ACS 5 Year Estimates

Table 18 Education Attainment by Age

Educational Attainment – Median Earnings in the Past 12 Months

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

Table 11 – Median Earnings in the Past 12 Months

Data Source Comments:

Median Earnings in the Past 12 Months	
Educational Attainment	2022 Inflation Adjusted Dollars
Less than high school graduate	40,638
High school graduate (includes equivalency)	35,207
Some college or Associate's degree	45,745
Bachelor's degree	61,821
Graduate or professional degree	71,621

Table 19 – Educational Attainment by Median Earnings

Source: 2022 ACS 5 Year Estimates

Table 19 Educational Attainment by Median Earnings

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

The Retail sector employs the largest number of workers at 27%, followed by Education and Health Care Services at 18%, Arts, Entertainment, Accommodations at 15%, and Professional, Scientific, Management Services at 10%.

Describe the workforce and infrastructure needs of the business community:

Since the data available for the last Consolidated Plan, the Town of Hamburg has seen a 17.5% increase in those who have had at least some college as part of their educational attainment. This combines with an increase in the Town in available jobs within many of the professional industries that require some college for a high percentage of their positions. These coinciding trends may help explain why travel time to work is decreasing overall for the Town of Hamburg workforce.

That said there is clearly a movement away from manufacturing jobs in Hamburg and Erie County and there is a high risk of displaced workers who will need skills training or additional educational attainment to find work within the growing industries. A report by Erie Community College found that the most significant workforce needs in the region relate to the aging population, the need for workers to remain current with ever-changing technology, and the skills gap that results from a mismatch between educational programs and workforce needs.

Again, travel time has decreased overall for Hamburg residents, however stakeholders said that there is a large regional problem with transportation systems that is creating a disconnect between low income workers and employment opportunities.

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

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

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

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

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

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

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

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

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

Yes

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

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

Discussion

Consolidated Plan

Hamburg

49

MA-50 Needs and Market Analysis Discussion

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

The greatest concentration of low-income households is found within Census tract 130.01, ranging between 40-55%. There are concentrations of low income households ranging from 25-40% in Census Tract 129.04 and 128.

The highest level of poverty is shown in Census tracts with between 10% and 18% of households meeting the poverty criteria. Census tracts having this degree of poverty concentration are 128, 129.01, 129.03, and 130.1. As can be viewed on the numbered Census tract map for the Town, designated Community Development target areas are within all of these Census tracts.

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

The Analysis of Impediments to Fair Housing Choice (2024) identified one census tract with significant concentrations of both poverty and minority populations. More specifically, these Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), are defined as areas where the non-white fraction of the population is more than double the overall non-white fraction of the population in the community and where the local poverty rate (census tract) is more than twice as large as the community poverty rate.

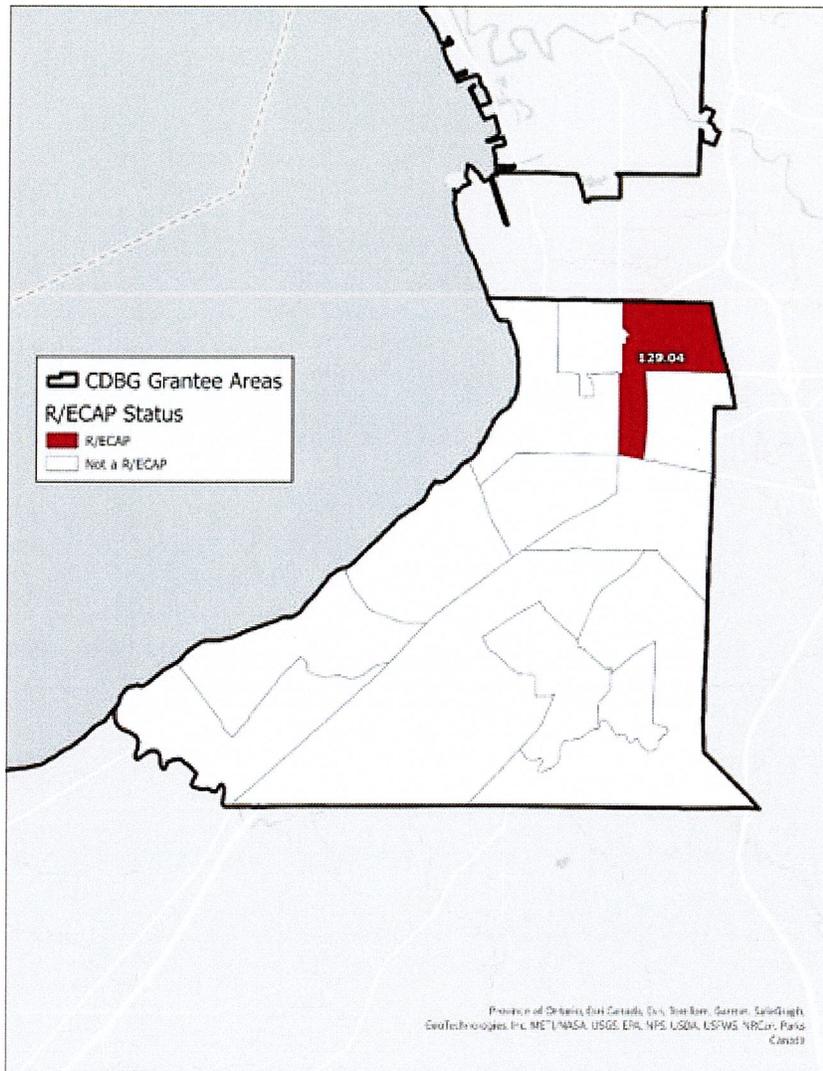
The census tract is located adjacent to multiple R/ECAPs in neighboring Lackawanna. Since the 2009- 13 ACS, the data from which are used by HUD in its AFFTH0004a dataset, the non-White share of population in this tract increased 3.4% and the poverty rate has stayed stable.

Notably, whereas the northwesternmost census tract in Hamburg was identified as a R/ECAP in the prior Analysis of Impediments to Fair Housing Choice process, patterns of population change since 2010 have coincided with racially/ethnically concentrated poverty shifting just to the east, where both Asian and Hispanic/Latinx residents live in disproportionate numbers relative to each group's share of Hamburg's overall population.

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

There are a number of older, early suburban developments in close proximity to the City of Lackawanna. The Village of Blasdell features commercial corridors and concentrated activity. As noted in the Needs Assessment, this area features the highest percentage of housing problem and has been an area of focus for rehabilitation activities.

Are there any community assets in these areas/neighborhoods?



Map Town of Hamburg RECAP

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

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

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

There is a fair amount of fiber optic cabling supporting the larger businesses of metropolitan Buffalo, but these providers either do not target residential or small business, or price their fiber optic services such that they are prohibitively expensive to residential users or small business. The Erie County Broadband Committee has specifically identified “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” as a significant need.

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

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

Verizon and Spectrum service levels vary, depending upon the infrastructure and services available in different parts of the County. The study found that while the urban and suburban areas of the County are for the most part served in terms of access and competition, many of the rural areas of the County, which are towns and villages to the south and east, are lacking and expected to fall further behind.

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

To meet the goal of “bringing high speed internet to these more rural, lower income areas of the County where it currently doesn’t exist or is very limited” one path was the creation of an Open Access Network (OAN) that would be available to public and private organizations and would improve broadband service throughout the Consortium. The creation of the OAN views broadband infrastructure as a utility necessary to maintain quality of life and keep communities competitive. While the development of the OAN was the most aggressive proposal in the 2017 Study, the availability of funding under the American Rescue Plan Act (ARPA) made the OAN a viable option for providing broadband service. In 2021, Erie County commissioned ECC Technologies, Inc. (ECC) to develop an OAN Business Plan, including a preliminary route design for a middle-mile fiber optic backbone interconnecting cities, towns and villages throughout the County. In 2022, ErieNet Local Development Corporation (ErieNet), a not-for-profit local development corporation, was formed to develop and operate the OAN, which is to be comprised of 400 miles of fiber optic backbone comprised of headend and regional points of presence, interconnections to public and private broadband providers, aerial and buried cable pathways, fiber optic cabling and components, and community anchor institutions (CAI’s) endpoints. Examples of CAI’s include County facilities, 911 centers, libraries, municipal facilities, school district facilities, higher education institutions, healthcare facilities, and other major employers. The dark fiber provided by ErieNet can be used by CAI’s for their own network communications and applications and also by telecommunications carriers, Internet Service Providers and other public and private broadband providers to extend and connect their infrastructure to their constituents and customers. Construction and launch of the OAN is being funded with \$34 million in ARPA funds and an additional \$2.8 million in County funding for design and construction management services. Installation has begun and is expected to be completed in mid-2025.

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

Describe the jurisdiction's increased natural hazard risks associated with climate change.

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

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

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

Ultimately the plan assessed the potential effects of hazards and the County's specific sensitivity to extreme heat, flooding, high winds, biological hazards, and limitations related to mobility and accessibility in order to gage the County's preparedness for natural hazards and to develop an action plan for hazard mitigation, hazard preparation, hazard response, and hazard recovery.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

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

The County has committed to utilize the Climate Action Fund to invest in "Opportunities" identified in the Climate Action and Sustainability Plan to directly respond to identified "Threats" and "Vulnerabilities"

Additionally, the County has partnered with the New York State Energy Research and Development Authority to develop the Erie County Low-Income Program for Sustainable Energy (ECLIPSE). ECLIPSE is intended to create a community-scale program to provide integrated energy services for Low- to Moderate-Income (LMI) households by purchasing energy in bulk for as many as 60,000 Home Energy

Assistance Program (HEAP) recipients in Erie County. An interdepartmental county team will work with partners, such as utilities and community organizations, to develop strategies to recruit LMI households into this bulk purchasing program.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Town of Hamburg continues to prioritize public facility improvements for infrastructure projects where eligible. The Town of Hamburg has shifted away from making loans for housing rehabilitation programs and is now only lending for rehabilitation as part of the Mobile Home Renovation Loan Program. This shift from loans to grants through the Housing Renovation Program is reflective of the high priority the Town is putting on maintaining quality housing and housing stability for low- and moderate-income residents.

Public services have become an even larger priority after the COVID-19 pandemic. The Town of Hamburg will continue to utilize partners like Belmont Housing Services of WNY, Housing Opportunities Made Equal (HOME), the Center for Elder Law & Justice, Neighborhood Legal Services, and Sts. Peter and Paul Outreach (remove the following - the Homeless Alliance of Western New York (HAWNY), and the Legal Aid Bureau) to provide public services to the residents of the Town.

The Town continues to foster economic development through a partnership with the Hamburg Development Corporation (HDC) to provide financial assistance to businesses creating job opportunities for low and moderate income residents.

Institutional Delivery Structure

The Town of Hamburg Department of Community Development administers CDBG and HOME funds via the Erie County HOME Consortium provided to the Town by HUD. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement the Strategic Plan, particularly to address homelessness and special needs populations.

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

Geographic Area

Table 12 - Geographic Priority Areas

1	Area Name:	Town of Hamburg Exception Target Area #1
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg CT130.02 BG 4. rail tracks to the west, Howard Road, the Creek to the northwest.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
2	Area Name:	Town of Hamburg Exception Target Area #2
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	

	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Lake Avenue to the north; Milestrip Road to the south; Bethford Drive to the east; east boundary of the Village of Blasdell to the west.
	Include specific housing and commercial characteristics of this target area.	Typical single family and two-family housing in this area. Nonindustrial commercial businesses in this area.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
3	Area Name:	Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #3
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Lackawanna border to north; Camp Road to the south; Route 5 to the east; Lake Erie to the west.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception Criteria Target Area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.

	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
4	Area Name:	Village of Blasdell Exception Target Area #4
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Village of Blasdell. Miller Avenue to the north; south boundary of the Village to the south; east boundary of the Village and South Park Ave to the east; Martin Ave to the west.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception Criteria Target Area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.	
Are there barriers to improvement in this target area?	No.	
5	Area Name:	Town of Hamburg Exception Target Area #5
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	

	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Milestrip Road to the north; Big Tree Road to the south; a rail line to the east; and Route 5 on the west.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
6	Area Name:	Village of Blasdell Exception Target Area #6
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Village of Blasdell. Lake Avenue to the north; Miller Avenue to the south; east boundary of Census Tract 128 (just east of South Park Avenue) to the east; Martin Street to the west.
	Include specific housing and commercial characteristics of this target area.	Typical housing and non-industrial commercial.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.	
What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.	

	Are there barriers to improvement in this target area?	No.
7	Area Name:	Town of Hamburg Exception Target Area #7
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Milestrip to the North; Sheldon Road to the South; Town of Orchard Park to the East; Brompton Drive to the West.
	Include specific housing and commercial characteristics of this target area.	Typical single family and two-family housing in this area. Nonindustrial commercial businesses in this area.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
Are there barriers to improvement in this target area?	No.	
8	Area Name:	Town of Hamburg Exception Target Area #8
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	

	Identify the neighborhood boundaries for this target area.	Town of Hamburg. First Street to the North; Seventh Street and Nelson Avenue to the South; Route 5 and Milestrip Road to the East; Woodlawn Avenue to the West.
	Include specific housing and commercial characteristics of this target area.	Typical housing in this area. Commercial characteristics of this area nonindustrial.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
9	Area Name:	Town of Hamburg Exception Target Area #9
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Sowles Road to the north; Camp Road to the south; rail line to the east; New York State Thruway to the west.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.

	Are there barriers to improvement in this target area?	No.
10	Area Name:	Town of Hamburg Exception Target Area #10
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Sowles and Bayview Roads to the north; Legion Drive to the south; Maelou Drive to the west; Clark Street to the east.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
Are there barriers to improvement in this target area?	No.	
11	Area Name:	Town of Hamburg Exception Target Area #11
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Milestrip Road on the north; Big Tree Road on the south; the New York State Thruway on the east; South Park Avenue on the west.

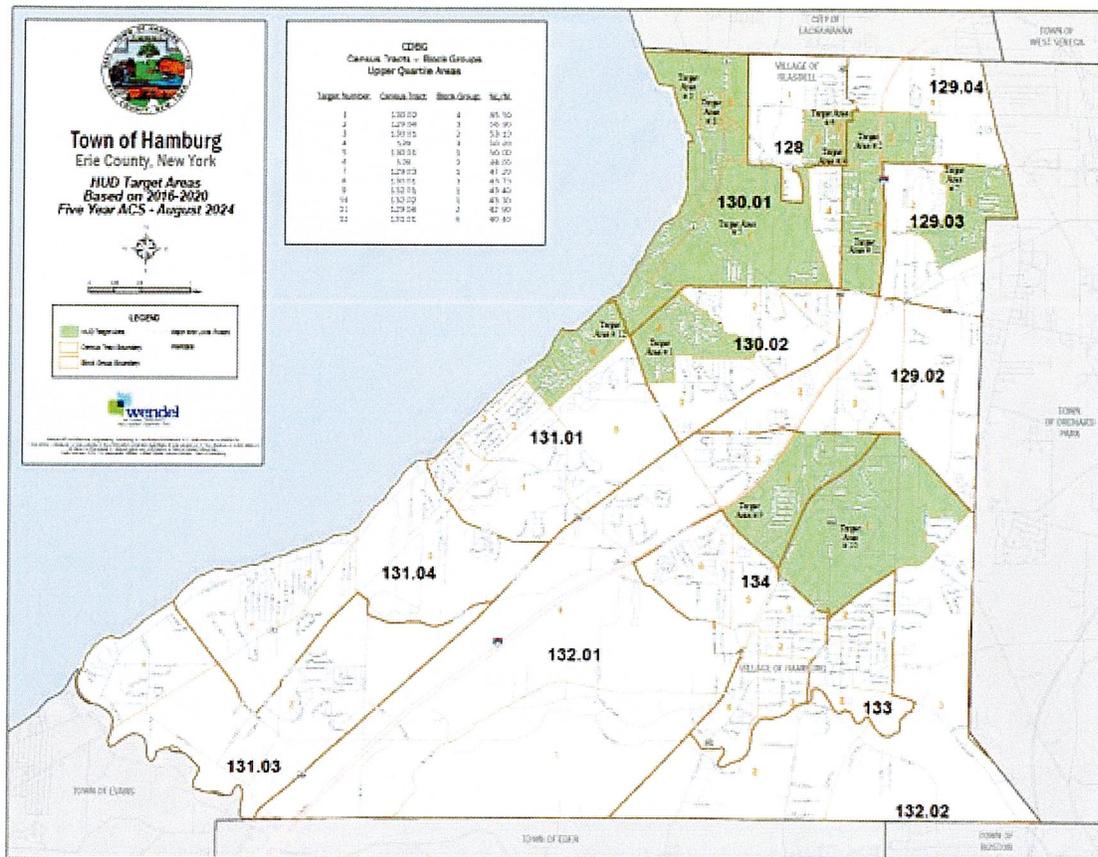
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
12	Area Name:	Town of Hamburg Exception Target Area # 12
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Town of Hamburg. Camp Road to the north; Rogers Road to the south; the rail tracks to the east; Lake Erie to the west.
	Include specific housing and commercial characteristics of this target area.	Typical Housing in this area and non-industrial commercial businesses.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Exception criteria target area.
	Identify the needs in this target area.	Housing rehabilitation and infrastructure improvements.
	What are the opportunities for improvement in this target area?	Housing rehabilitation and infrastructure improvements.
	Are there barriers to improvement in this target area?	No.
13	Area Name:	Town Wide
	Area Type:	Local Target area

Other Target Area Description:	
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	Housing
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	Lake Erie to the west. The City of Lackawanna to the north. The Town of Orchard Park to the East. The towns of Evans, Boston, and Eden to the South
Include specific housing and commercial characteristics of this target area.	Older 1800's to new homes, villages of Hamburg and Blasdell with higher density, and commercial areas off of Interstate 90.
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	Housing rehabilitation to stabilize the neighborhood and continue sustainability, Infrastructure improvements and public facilities.
What are the opportunities for improvement in this target area?	Neighborhood sustainability and preservation.
Are there barriers to improvement in this target area?	Older properties, increasing housing instability, proximity to Lackawanna (different demographic characteristics).

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

With 12 target areas and a relatively modest allocation of federal resources, the Town of Hamburg focuses much of the direct investment of CDBG and HOME funding into the target areas based on their specific need. A high percentage of the housing rehabilitation and infrastructure funding is therefore allocated to activities within the Village of Blasdell.



Hamburg Target Area Map

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

Priority Needs

Table 13 – Priority Needs Summary

1	Priority Need Name	Public Facilities and Infrastructure Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Public Facilities and Infrastructure Improvements
	Description	Infrastructure and facility improvements in the Town of Hamburg and the Village of Blasdell. Such projects may include waterlines, street repaving, drainage improvements and other types of infrastructure improvements within HUD eligible target areas, including projects such as Hamburg Highway Dept. and Martin Avenue
	Basis for Relative Priority	Improving and maintaining the public infrastructure continues to be a high priority. There is an ongoing need to address inadequate streets and sidewalks in poor surface condition, crumbling curbs in need of replacement and redesign to facilitate mobility for a cross-section of residents' as well as a need to address inadequate drainage and aging water infrastructure.
2	Priority Need Name	Improve Housing Stock
	Priority Level	High
	Population	Low Moderate
	Geographic Areas Affected	
	Associated Goals	Improve Housing Stock - Renovation

	Description	Housing renovation continues to be in high demand in Hamburg. The older housing stock, particularly in early suburban developments, requires ongoing maintenance and up-keep to maintain decent living conditions. In addition to grants for eligible homeowners, the Town sees a need for resources to assist with mobile home repairs and provides 2% loans for that purpose.
	Basis for Relative Priority	The older housing stock in the community requires ongoing housing rehabilitation. The popularity of the program shows the ongoing need and high demand for housing rehabilitation.
3	Priority Need Name	Public Services and Fair Housing
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Fair Housing Public Services
	Description	The Town has contracted with Housing Opportunities Made Equal (HOME), a Fair Housing Counseling and Enforcement Agency, to provide fair housing and landlord/tenant counseling. Budget, credit, debt, and foreclosure counseling are provided in conjunction with Belmont Housing Resources for WNY. The Town of Hamburg works to prevent homelessness by partnering with wit Elder Law & Justice and Neighborhood Legal Services for eviction protection services and counseling.
	Basis for Relative Priority	Public services continue to be a high priority in Hamburg, even more so in the wake of COVID-19. Additionally, cost burdening is an issue for Town residents, both homeowners and renters, creating financial stress in the housing market and the need for support services. The Town also has a significant number of housing developments available to low-and-moderate-income households and larger multifamily structures (5 units or more) predominate the rental supply, generating the potential for fair housing concerns.
4	Priority Need Name	Economic Development
	Priority Level	High

	Population	Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Economic Development
	Description	The Department of Community Development has jurisdiction and reporting duties over the Town’s economic development loan program. The economic development loans are part of the Town’s Community Development Block Grant funding and portfolio. Currently, the Town of Hamburg has an Agreement with the Hamburg Development Corporation (HDC) to administer its economic development program. The “HDC” is a direct sub-recipient of the Town of Hamburg and its Community Development Block Grant (CDBG) funding.
	Basis for Relative Priority	The difficulty of owning and operating a business, especially a small business, has only increased since the pandemic. Supply chain interruptions, interest rate increases, and general economic uncertainty create a situation where additional capital is often necessary and incentives can help businesses survive and/or grow.
5	Priority Need Name	Homeless Assistance
	Priority Level	High
	Population	Extremely Low Low Moderate Rural Chronic Homelessness Individuals
	Geographic Areas Affected	
	Associated Goals	Homeless Prevention Program
	Description	The Town of Hamburg works to prevent homelessness by partnering with wit Elder Law & Justice and Neighborhood Legal Services for eviction protection services and counseling.
	Basis for Relative Priority	Housing shortages in the region and increased cost burdens related to housing have increased the number of households who are at-risk of becoming homeless.

Narrative (Optional)

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

Introduction

The Town of Hamburg's highest priorities for PY 2025 include infrastructure/street improvements, housing rehabilitation, homeownership assistance, comprehensive fair housing services, housing counseling (budget, credit, debt, and foreclosure assistance, eviction/legal services, homeless prevention and economic development as priority projects. Geographically, the Town of Hamburg focuses its CDBG funds in its HUD defined Low and Moderate Income target areas based upon the American Community Survey (ACS) update (August, 2024). The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, usually expending its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$			Total: \$
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	445,160	100,000	0	545,160	2,000,000	All figures are based upon current CDBG program estimates and are subject to change via the federal budget process.

Table 14 - Anticipated Resources

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

The Village of Blasdell utilizes their own funds to add to their CDBG projects. This amount vary from year to year based upon municipal budgets. The Town of Hamburg also provides credit in the form of building permits and fees to act as a match for HOME funds through the Consortium with Erie County.

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

Discussion

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Belmont Housing Resources for WNY, Inc.	Non-profit organizations	Ownership Rental	Region
Center for Elder Law and Justice	Non-profit organizations	public services	Region
HOUSING OPPORTUNITIES MADE EQUAL, INC.	Non-profit organizations	Rental	Region
Saints Peter and Paul Parish Outreach and Food Pantry	Non-profit organizations	public services	Jurisdiction
Neighborhood Legal Services	Non-profit organizations	public facilities	Region
Hamburg Development Corp.	Non-profit organizations	public services	Jurisdiction

Table 15 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths

The Hamburg Community Development Department is an effective point of contact for the programming put forth in the Consolidated Plan. The Department works with non-profit partners to deliver public services ranging from eviction prevention and fair housing, to budget, credit and debt counseling. The Department can cross-reference programs and services in order to match residents with multiple programs including the Town's direct rehabilitation program and homeless prevention program when applicable.

Gaps

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

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

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

Table 16 - Homeless Prevention Services Summary

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

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

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

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

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

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

Other Street Outreach Services - The Department of Social Services has contracted Crisis Services to serve homeless individuals in need of emergency shelter when DSS-Emergency Housing is closed.

Alcohol & Drug Abuse – The Erie County Department of Alcohol and Substance Abuse administers drug and alcohol prevention programs while detoxification services for alcohol and substance abuse are available through Erie County Medical Center, Buffalo General Hospital, Alcohol and Drug Dependency Services

Child Care - The Day Care Unit provides integral referrals and information to all families, service providers, community-based organizations and divisions with the Erie County Department of Social Services. Referrals are provided to clients after determining the most effective level of services available.

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

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

Healthcare - The Erie County Health Department's Indigent Nursing Program provides health assessment and some basic medical care to homeless individuals at various community service agencies. The Community Health Center also does medical assessments of low-income individuals in the community.

HIV/AIDS - The Planned Parenthood of Buffalo and Erie County Mobile Outreach Unit screens clients for sexually transmitted diseases and other medical needs.

Life Skills - The CASH coalition (Creating Assets Savings and Hope) continues to operate two "Hope Centers" that provide onsite access to financial management counselors, benefits counselors, and help with filing for the earned income tax credit.

Financial management intervention, counseling services, advice on budgeting and financial problems, and other life skills programming are provided through: Consumer Credit Counseling Service of Buffalo, Catholic Charities, Business and Professional Women of Buffalo, and Cornell Cooperative Extension.

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

For Special Needs Populations there is a Single Port of Entry process throughout the Continuum of Care region. Specific to Hamburg, the Town refers its residents to programs to combat homelessness such as the eviction prevention and counseling services provided by Neighborhood Legal Services and the Center for Elder Law & Justice.

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

The Town of Hamburg works closely with appropriate local agencies within the Continuum of Care

The plan highlights the need for wider awareness and use of mainstream resources and existing community services. It advocates educating consumers, service providers, and the local community to empower people to better access the benefits and services for which they or their clients are eligible.

The Continuum of Care Alignment section includes six goals that aim to improve the homeless service system throughout the CoC service area. The goals range from developing and codifying systematic approaches for addressing obstacles and meeting gaps to improving data collection and performance measurement efforts.

The Town addresses situations where families or individuals may slip through the cracks in the service delivery system by working with Belmont Housing to identify any extreme, emergency homeless situations, and making provision for payment to a hotel or motel for a period of time until a longer-term solution can be reached.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Infrastructure Improvements	2025	2029	Non-Housing Community Development		Public Facilities and Infrastructure Improvements	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Other: 10 Other
2	Improve Housing Stock - Renovation	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$820,160	Homeowner Housing Rehabilitated: 40 Household Housing Unit
3	Improve Housing Stock - Homeownership Assistance	2025	2029	Affordable Housing			CDBG: \$200,000	Direct Financial Assistance to Homebuyers: 10 Households Assisted
4	Fair Housing	2025	2029	Affordable Housing		Public Services and Fair Housing	CDBG: \$50,000	Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
5	Public Services	2025	2029	Non-Housing Community Development		Public Services and Fair Housing	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Economic Development	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$375,000	Jobs created/retained: 12 Jobs
7	Homeless Prevention Program	2025	2029	Homeless		Homeless Assistance	CDBG: \$100,000	Homelessness Prevention: 40 Persons Assisted

Table 17 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	Public infrastructure improvements, including milling/paving of streets within designated HUD target areas will be a priority for the Town as well as public facility improvements within said target areas.
2	Goal Name	Improve Housing Stock - Renovation
	Goal Description	The Town of Hamburg provides grant funding for low- and moderate-income clients through the Housing Renovation Grant program and the Mobile Home Renovation Loan Program (2% loan up to \$7,500).
3	Goal Name	Improve Housing Stock - Homeownership Assistance
	Goal Description	The Town of Hamburg provides first time homebuyer grants up to \$20,000 for the purchase of an existing home within the Town and its Villages
4	Goal Name	Fair Housing
	Goal Description	Fair Housing counseling and landlord/tenant counseling will be provided in conjunction with Housing Opportunities Made Equal (HOME).

5	Goal Name	Public Services
	Goal Description	The Town contracts with service providers including Bemont Housing Resources to provide budget, credit and debt counseling, as well as foreclosure prevention counseling and services. The Town also contracts with The Center for Elder Law and Justice for housing, legal, and eviction services.
6	Goal Name	Economic Development
	Goal Description	Funds issued as loans to for-profit businesses for job creation and/or retention purposes. An estimated \$75,000 in revolving Loan Funds (RLF) is anticipated for use in PY 2025 (or \$375,000 over the next five years from 2025-2029).
7	Goal Name	Homeless Prevention Program
	Goal Description	The Town of Hamburg works with the Center for Elder Law & Justice and Neighborhood Legal Services to provide legal and eviction prevention services to combat the addition of new members to the homeless population. The Town further supports homeless individuals staying in local hotels with assistance to food pantry and outreach services.

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

The Town of Hamburg estimates the following assistance based on the identified program:

- 1) Housing Rehabilitation (CDBG): An estimated 8 households will be assisted via the Housing Rehabilitation Program annually. This program is targeted towards low- and moderate- income households (80% and lower of MHI)
- 2) Housing Renovation Grants (HOME): An estimated five households will be assisted via the Housing Renovation Grant Program annually. This program is targeted towards low- income households (50% and lower of MHI).

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

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

The Town of Hamburg Community Development Department provides educational materials to the community and to applicants for housing -based programs that provide information on the danger of lead paint hazards and ways to minimize risk associated with them. Homeowners are advised of the availability of testing for elevated levels of lead in the blood of children.

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

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

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

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

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

The Town of Hamburg takes a comprehensive look at combatting poverty through education and counseling, the provision of affordable housing and opportunities for homeownership, housing rehabilitation programs to keep people housed and housed in quality residential units, supporting economic development and job creation in the town, and by creating partnerships to provide goods and services to residents in need. Specifically, the Town:

- Implements a first-time homebuyer to provide opportunities for homeownership without the high initial cost burden that can lead to 'house poverty'
- Provides rehabilitation assistance for rental properties, owner-occupied, and mobile homes in order to lessen cost the burden of maintaining a residence and helping maintain quality living standards
- Partners to provide budget, debt, and credit counseling as well as legal services to prevent eviction and foreclosure
- Supports the Hamburg Development Corporation's loan program that funds businesses creating new job opportunities for low- and moderate-income individuals
- Supports the efforts of St. Peter & Paul Parish Outreach who has a contract with Feedmore WNY to provide food to those in need - including homeless individuals and families that are living in Town

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

As noted in the Market Analysis, housing prices have increased significantly in the Town of Hamburg, however Hamburg remains affordable in comparison to the regional market and provides stable and affordable residential opportunities in a community with a relatively high quality of life in close proximity to significant economic opportunity and in a community with strong social and municipal services. This is supported by the fact that, for the last two years, sale prices have continued to match or exceed asking prices in Hamburg demonstrating the pressure that lack of supply to meet the demand is putting on housing costs.

The Town is focused on continued efforts to improve the supply of quality affordable houses, while maintaining strong municipal services and strong social services to those in need.

SP-80 Monitoring - 91.230

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

The Town of Hamburg Department of Community Development will continue to monitor its sub-recipient, the Hamburg Development Corporation (HDC), on a bi-annual basis as has been done in the past.

The Hamburg Town Board has directed the Department of Community Development to assist the Hamburg Development Corporation (HDC) with economic development funds through the use of CDBG Program Income funds. To this end, the HDC provides economic development loans that are geared toward job creation and/or job retention. Over the past several years, the Department of Community Development has required the HDC to update its program application and to also update and amend its reporting requirements to be consistent with the regulations for the Community Development Block Grant (CDBG) program. In order to ensure that the HDC was following the proper HUD required regulations, the Department of Community Development completes bi-annual monitoring of the HDC that includes on site reviews of loan files, job creation numbers, evaluation of its program and the effectiveness in which the funds are utilized. Twice a year the Department of Community Development specifically monitors the HDC, its books, files and records to ensure that the CDBG funding provided to the HDC is utilized in a way that is eligible within the regulations for the CDBG program.

With respect to the Town's housing programs, the Town of Hamburg Department of Community Development staff along with the Town of Hamburg Finance Department reviews all housing program balances, loan pay offs, deposits and expenditures on a monthly basis.

For both Village of Hamburg and Village of Blasdell Infrastructure projects, the Town conducts visits of job sites to complete employee interviews. In addition, the Town reviews payroll for these projects to ensure Davis-Bacon requirements are being followed.

The Town also makes regular updates to its policies and procedures for all of our programs, submits quarterly Federal Financial Transaction Reports, and makes semi-annual submissions of Federal Labor Standards Report and annual submissions of MBE/WBE Contracting-Subcontracting Reports.

In addition to monitoring's conducted by Town personnel, Erie County conducts periodic monitoring's of all HOME-funded projects under Hamburg's Homeowner Rehabilitation program, including: inspection of case files to determine compliance with HOME standards; review of compliance with proper lead testing and remediation procedures; on-site visits; and review of project management (including record-keeping and documentation).

Expected Resources

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

Introduction

The Town of Hamburg's highest priorities for PY 2025 include infrastructure/street improvements, housing rehabilitation, homeownership assistance, comprehensive fair housing services, housing counseling (budget, credit, debt, and foreclosure assistance, eviction/legal services, homeless prevention and economic development as priority projects. Geographically, the Town of Hamburg focuses its CDBG funds in its HUD defined Low and Moderate Income target areas based upon the American Community Survey (ACS) update (August, 2024). The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, usually expending its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	445,160.00	0.00	545,160.00	2,000,000.00	All figures are based upon current CDBG program estimates and are subject to change via the federal budget process.

Table 18 - Expected Resources -- Priority Table

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

The Village of Blasdell utilizes their own funds to add to their CDBG projects. This amount vary from year to year based upon municipal budgets. The Town of Hamburg also provides credit in the form of building permits and fees to act as a match for HOME funds through the Consortium with Erie County.

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

Discussion

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Infrastructure Improvements	2025	2029	Non-Housing Community Development	Village of Blasdell Exception Target Area #6 Town of Hamburg Exception Target Area #8	Public Facilities and Infrastructure Improvements	CDBG: \$215,160.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
2	Improve Housing Stock - Renovation	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$150,000.00	Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Fair Housing	2025	2029	Affordable Housing			CDBG: \$10,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Public Services	2025	2029	Non-Housing Community Development			CDBG: \$18,750.00	Public service activities other than Low/Moderate Income Housing Benefit: 75 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Development	2025	2029	Non-Housing Community Development		Economic Development	CDBG: \$70,000.00	Jobs created/retained: 5 Jobs
6	Homeless Prevention Program	2025	2029	Homeless			CDBG: \$30,000.00	Homelessness Prevention: 5 Persons Assisted
7	Improve Housing Stock - Homeownership Assistance	2025	2029	Affordable Housing		Improve Housing Stock	CDBG: \$80,000.00	Direct Financial Assistance to Homebuyers: 4 Households Assisted

Table 19 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	
2	Goal Name	Improve Housing Stock - Renovation
	Goal Description	
3	Goal Name	Fair Housing
	Goal Description	

4	Goal Name	Public Services
	Goal Description	Under this goal of Public Services, the Town of Hamburg will provide Housing Counseling (Budget, Credit, Debt & Foreclosure Counseling) and Legal/Eviction services for eligible residents.
5	Goal Name	Economic Development
	Goal Description	Funds provided with CDBG Program Income.
6	Goal Name	Homeless Prevention Program
	Goal Description	Funds utilized with CDBG Program Income
7	Goal Name	Improve Housing Stock - Homeownership Assistance
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Town of Hamburg's priorities for 2025 include infrastructure/street improvements, housing renovations, grants to assist first-time homebuyers, comprehensive fair housing services, public services including housing counseling, legal/eviction and homeless prevention services as its priority projects. Geographically, the Town of Hamburg focuses the majority of CDBG funds in its HUD defined Low and Moderate Income target areas based upon the August, 2024 ACS mapping data. The Town of Hamburg Department of Community Development administers CDBG funds provided to the Town by HUD in an ongoing basis, which usually expends its funding the same year it is received. The primary goal of the Community Development Program is to develop and maintain viable communities with respect to housing, neighborhoods, public services and economic opportunities. The Town relies on a network of public, private sector, and non-profit organizations to implement its Strategic Plan, particularly to address homelessness and special needs populations.

#	Project Name
1	Town of Hamburg Infrastructure Reconstruction
2	Blasdell Infrastructure Reconstruction
3	Housing Renovation Grants
4	Homeownership Assistance - First Time Homebuyer
5	Fair Housing Services
6	Housing Counseling
7	Legal/Eviction Services
8	Job Creation

Table 20 – Project Information

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

Allocation priorities are based upon past and recent needs combined with the ability to expend CDBG funds in a timely manner. Lack of funding is an obstacle to addressing underserved needs.

AP-38 Project Summary

Project Summary Information

1	Project Name	Town of Hamburg Infrastructure Reconstruction
	Target Area	Town of Hamburg Exception Target Area #8
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$140,160.00
	Description	Use of CDBG funds for public infrastructure in conjunction with the Town of Hamburg Highway Department. L/M target area roads to be identified then milled/repaved.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	To be determined: 1) Once funding is formally approved by Congress and passed into law. 2) Roads to be identified within HUD Target Areas with the Highway Department.
	Location Description	Roads to be identified within HUD Target Areas in conjunction with the Hamburg Highway Department. Target Area #8
	Planned Activities	Milling and repaving of roads within HUD Target area(s).
2	Project Name	Blasdel Infrastructure Reconstruction
	Target Area	Village of Blasdel Exception Target Area #4
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$75,000.00

Description	Use of CDBG funding for public infrastructure in conjunction with the Village of Blasdell Public Works Department. Salisbury Avenue being the targeted street.
Target Date	12/31/2025
Estimate the number and type of families that will benefit from the proposed activities	Dependent upon final funding awarded.
Location Description	Salisbury Avenue within HUD Targets areas.
Planned Activities	Public infrastructure improvements in conjunction with the Village of Blasdell Public Works Department on Salisbury Avenue.
3	
Project Name	Housing Renovation Grants
Target Area	Town Wide
Goals Supported	Improve Housing Stock - Renovation
Needs Addressed	Improve Housing Stock
Funding	CDBG: \$150,000.00
Description	Conditional grants to low/moderate income residents for repairs to their owner-occupied dwellings. Roofs, windows, furnaces, electrical, etc.
Target Date	3/31/2026
Estimate the number and type of families that will benefit from the proposed activities	Eight
Location Description	To be determined upon individual approvals for qualification.
Planned Activities	Conditional grants to low/moderate income residents for repairs to their owner-occupied dwellings. Roofs, windows, furnaces, electrical, etc.
4	
Project Name	Homeownership Assistance - First Time Homebuyer
Target Area	Town Wide

Goals Supported	Improve Housing Stock - Homeownership Assistance
Needs Addressed	Improve Housing Stock
Funding	CDBG: \$80,000.00
Description	Conditional grants to income qualified first time homebuyers. Up to \$20,000 per grant.
Target Date	3/31/2026
Estimate the number and type of families that will benefit from the proposed activities	Four
Location Description	Area wide activity based upon income qualification. Townwide, including the Villages of Blasdell and Hamburg.
Planned Activities	Conditional grants to qualified first time homebuyers.
Project Name	Fair Housing Services
Target Area	Town Wide
Goals Supported	Fair Housing
Needs Addressed	Public Services and Fair Housing
Funding	CDBG: \$10,000.00
Description	Funding for Fair Housing services for town residents via a contract with Housing Opportunities Made Equal.
Target Date	3/31/2026
Estimate the number and type of families that will benefit from the proposed activities	Fifty
Location Description	6122 South Park Avenue, Hamburg, NY 14075
Planned Activities	Fair Housing services for town residents via a contract with Housing Opportunities Made Equal, including monthly hours on site in Hamburg.
5	

6	Project Name	Housing Counseling
	Target Area	Town Wide
	Goals Supported	Public Services
	Needs Addressed	Public Services and Fair Housing
	Funding	CDBG: \$5,000.00
	Description	Housing Counseling services via a contract with Belmont Housing Resources for WNY. Budget, credit, debt, foreclosure, HUD approved first time buyer counseling and homeless services.
	Target Date	3/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	Twenty-five
	Location Description	6122 South Park Avenue, Hamburg, NY 14075
	Planned Activities	Housing Counseling services via a contract with Belmont Housing Resources for WNY. Budget, credit, debt, foreclosure, HUD approved first time buyer counseling, and homeless services.
7	Project Name	Legal/Eviction Services
	Target Area	Town Wide
	Goals Supported	Public Services
	Needs Addressed	Public Services and Fair Housing
	Funding	CDBG: \$10,000.00
	Description	Legal and eviction services to eligible residents in an effort to prevent homelessness.
	Target Date	3/31/2026

	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	Twenty
	<p>Location Description</p>	6122 South Park Avenue, Hamburg, NY 14075
	<p>Planned Activities</p>	Legal and eviction services to eligible residents in an effort to prevent homelessness.
8	<p>Project Name</p>	Job Creation
	<p>Target Area</p>	Town Wide
	<p>Goals Supported</p>	Economic Development
	<p>Needs Addressed</p>	Economic Development
	<p>Funding</p>	CDBG: \$75,000.00
	<p>Description</p>	Job creation for low income clients via loans to for profit businesses.
	<p>Target Date</p>	3/31/2026
	<p>Estimate the number and type of families that will benefit from the proposed activities</p>	5 Jobs created via economic development loans to for profit businesses.
	<p>Location Description</p>	Various through the town based upon applications submitted during the PY.
	<p>Planned Activities</p>	Jobs created via economic development loans to for profit businesses.

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

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

As in the past, the Town of Hamburg expends its public facility projects within HUD target areas only. Further projects/services are directed to low/moderate income residents, thus maintaining the 100% low/moderate income expenditures.

Geographic Distribution

Target Area	Percentage of Funds
Town of Hamburg Exception Target Area #1	
Town of Hamburg/Woodlawn/Hoover Beach Exception Target Area #3	
Town of Hamburg Exception Target Area #2	
Village of Blasdell Exception Target Area #4	
Town of Hamburg Exception Target Area # 12	
Town of Hamburg Exception Target Area #5	
Village of Blasdell Exception Target Area #6	
Town of Hamburg Exception Target Area #7	
Town of Hamburg Exception Target Area #8	
Town of Hamburg Exception Target Area #11	
Town of Hamburg Exception Target Area #10	
Town of Hamburg Exception Target Area #9	

Table 21 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Based upon HUD target areas created by the ACS as detailed in August, 2024.

Discussion

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

Introduction

The Town of Hamburg and its Department of Community Development actively coordinates with agencies, municipalities, housing providers and social service agencies that directly benefit town and village residents. Examples are contracts with Housing Opportunities Made Equal, Inc.; Belmont Housing Resources for WNY; The Center for Elder Law & Justice and also with other agencies such as Neighborhood Legal Services; Sts. Peter & Paul Food Pantry/Outreach. Furthermore we have contacts within Erie County agencies, Rural Outreach Center, and others to assist our residents.

Actions planned to address obstacles to meeting underserved needs

As part of ongoing efforts to address underserved needs, the Town of Hamburg works closely with the Continuum of Care agencies, other municipalities, and other Erie County departments to address said needs.

Actions planned to foster and maintain affordable housing

The Town of Hamburg has been and will continue to be at the forefront of affordable housing in the region. Our work with over 600 families in providing homeownership assistance since 1992 continues to this day. Our housing renovation program continues at a steady rate of performance since we changed the program from loans to conditional grants. Our mobile home repair program continues to assist clients with repairs to the homes with an extremely low loan interest rate of 2%. Specific housing counseling for housing issues also maintains affordable housing in Hamburg.

Actions planned to reduce lead-based paint hazards

Any client/family proceeding through our housing programs will have their home checked for lead and if needed be cleared for lead during their housing process.

Actions planned to reduce the number of poverty-level families

Reducing poverty-level families directly relates to the amount of funding received by the Town of Hamburg via the CDBG entitlement program. Programs addressing food insecurity, rent relief, homelessness and others are being included annually within our annual CDBG projects. Contacts with numerous public service agencies are continued throughout the year to assist in this matter.

Actions planned to develop institutional structure

The Town of Hamburg continues to look for innovative ways to keep and develop its institutional structure for its residents, especially for those low/moderate income residents. Working with not-for-

profits, countywide agencies and other municipalities continues to be effective in this matter.

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

The Town of Hamburg through its Department of Community Development already coordinates between housing and social service agencies directly benefitting town residents. Examples are contracts with Housing Opportunities Made Equal, Inc.; Belmont Housing Resources for WNY; The Center for Elder Law & Justice along with coordinating with other agencies such as Neighborhood Legal Services; Sts. Peter & Paul Food Pantry/Outreach. Furthermore we have contacts within Erie County agencies, Rural Outreach Center, and others to assist our residents.

Discussion

Program Specific Requirements

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

Introduction

Projects planned with CDBG funds are expected to be available during the year are identified in the Projects Table AP-35 (2025). The following identifies an additional \$100,000 in CDBG program income funding that is estimated to be available for use during the upcoming 2025 program year. Projects to be funded include loans to for-profit businesses for job creation and homeless prevention use via our Homeless Prevention Program.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	100,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	100,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

Overall Benefit - A period of three years is utilized to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. This new Consolidated Plan covers the years 2025, 2026 & 2027.

Attachments

Grantee Unique Appendices

HAMBURG COMMUNITY DEVELOPMENT

6100 South Park Avenue * Hamburg * New York * 14075
(716) 648 - 6216 * www.townofhamburgny.gov/195/community-development
Director: Christopher Hull * Assistant Director: Timothy J. Regan

Hamburg Town Supervisor: Catherine A. Rybczynski

Council Members: Frank M. Bogulski * Megan A. Comerford * Elizabeth C. Farrell - Lorentz * Daniel M. Kozub



**Town of Hamburg
Department of Community Development
Program Year 2025 Citizen Participation Plan**

All Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Program, and any COVID CARES Act funding activities proposed by the Town of Hamburg through its Department of Community Development shall meet the requirements of the United States Department of Housing and Urban Development (HUD) as outlined in 24 CFR Part 91 Subpart B (91.105), as amended. For these activities, the following citizen participation plan will be utilized.

I) 2025 Program Year Citizens Participation Plan:

The Town of Hamburg is committed to having as much input and participation from its residents as possible, especially when developing its plans, programs and activities that utilize federal funding. To this end, the Town of Hamburg Department of Community Development welcomes and openly solicits participation from its residents on all issues pertaining to its Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program and any CARES Act funding. In order to facilitate this participation from town residents (including the residents from the Villages of Hamburg and Blasdell), the Town of Hamburg Department of Community Development will follow this amended "Citizen Participation Plan" and any future updates to said plan that are required or necessitated, such as for the COVID-19 pandemic or other natural disaster(s).

A) Public Hearings:

The Town of Hamburg Department of Community Development, prior to any public hearing held at any location will make public through at least one (1) legal/public notice published in an "official" Town of Hamburg designated publication. In 2025, this has been designated as "The Hamburg Sun". Further, a notice of any public hearing(s) shall also be placed on the Town of Hamburg's website. If during a time of emergency, such as the COVID-19 pandemic or other natural disaster(s) other measures may be utilized including items listed under Section J within this Plan:

- 1) Listing of locations for public hearings during normal, non-pandemic circumstances. Can be at one or all of the following locations:

Hamburg Town Hall 6100 South Park Avenue Hamburg, New York 14075	Hamburg Community Development 6122 South Park Avenue Hamburg, New York 14075
Hamburg Village Hall 100 Main Street Hamburg, New York 14075	Blasdell Village Hall 121 Miriam Avenue Blasdell, New York 14219
- 2) The date(s), time(s) and location of any public hearing pertaining to the Community Development Block Grant and/or the Home Investment Partnership Program.
- 3) The details of said hearing including the reason for said hearing and its contact information.
- 4) Within all notices, there will be specific information instructing persons with special needs what they can do to be accommodated at said hearing(s). The notice shall also state if the hearing locations are accessible and contact information specifically for any person(s) with special needs on how to access the hearings.

B) Submission of Five Year and/or Annual Plan(s):

The Town of Hamburg will, prior to the submission of its Five Year Consolidated Plan and/or its Annual Action Plan will make public and available information that includes but is not limited to the following:

- 1) The amount of Community Development Block Grant, Home Investment Partnership Program, or any other HUD funds expected to be available, including the amount of program income to be received during the upcoming program year.
- 2) The activities expected to be undertaken by the Town of Hamburg Department of Community Development for these programs during its upcoming program year.
- 3) The amount of funding that will benefit persons of low and moderate incomes.
- 4) The general publication and specific notification to individuals, families and businesses when and if necessary with relevance to activities that will displace them. {However, the Town of Hamburg fully expects and will strive for that there will not be any activities undertaken to displace individuals, families or businesses with the CDBG, HOME or, any other funded programs}.

C) Five Year and/or Annual Plan Public Hearing(s):

The Town of Hamburg Department of Community Development in conjunction with the County of Erie will prior to any public hearing held (either at Hamburg Town Hall or at the Community Development Building) will make public through a legal notice(s) published in either the Buffalo News or an "official" Town of Hamburg publication and on the Town of Hamburg's web-site within the Department of Community Development homepage any or all of the following information pertaining to the public hearing(s). In addition to the public hearing notice, notifications will also state that the Five Year Consolidated Plan and/or its Annual Action Plan are available for public comment and review. The length of time any Five Year Consolidated Plan and/or Annual Action Plan is published within any publication will be minimally equivalent to HUD regulations pertaining to such notice of time (example; 30 days or 5 days for emergency funding, ie: COVID \$).

- 1) The Five Year Consolidated Plan, the Annual Action Plan and/or any Substantial Change/Amendment(s) to said Plans are available for review at the following places located within the Town of Hamburg:

Hamburg Community Development
6122 South Park Avenue
Hamburg, New York 14075 648-6216

Hamburg Public Library
102 Buffalo Street
Hamburg, New York 14075 649-4415

Blasdell Village Hall
121 Miriam Avenue
Blasdell, New York 14219 822-1921

Hamburg Village Hall
100 Main Street
Hamburg, New York 14075 649-0200

Hamburg Town Hall - Town Clerks Office
6100 South Park Avenue
Hamburg, New York 14075 649-6111

Town of Hamburg Website
www.townofhamburgny.gov

County of Erie
Department of Environment and Planning
95 Franklin Street
Buffalo, New York 14202 858-8390

- 2) Any citizen or group requesting a copy of the Five Year Consolidated Plan, the Annual Action Plan and/or any amendments will have up to two (2) copies of the document as requested sent to them at no cost. Any further requested documents above the number of two (2) will carry a copy charge of \$10.00 per completed paper document, however, the document is available online within the Town of Hamburg (www.townofhamburgny.gov) and Erie County (www4.erie.gov) website.

- 3) Public hearing(s) will be held throughout the Consolidated Planning process and the Annual Action Plan process, both in conjunction with the County of Erie for consortium purposes and/or individually within the Town of Hamburg for non-consortium purposes. A minimum of six public hearing will be held, with proper notifications to the general public as detailed. (Minimum of six (6) during summer/fall and one for review of any "Draft" plan.)
 - a) For a Five Year Consolidated Plan or an Annual Action Plan, a minimum of thirty (30) days will be allotted for public comment and review of either "draft" document.
 - b) For any other document, ie: CAPER, Amendment or Change of Use of Funding, etc., a minimum of fifteen (15) days will be allotted for public comment and review.
 - c) Any and all citizen comments/views received within the proper time frames will be considered and included in any final document.
 - d) During crisis situations, such as COVID-19 or other natural disaster(s) virtual hearings and five days response limits to a specific e-mail address CDpublichearing@townofhamburgny.gov will be utilized.

D) Substantial Change/Amendments:

Any change in use of funds or program direction equating to 25% or more of a particular CDBG program year funds (inclusive of any and all program income funds) shall be deemed a "Substantial Change/Amendment" and will require citizen comment and review. To this end, a notice shall be published in the Buffalo News or an "official" Town of Hamburg publication and on the Town of Hamburg's web-site within the Department of Community Development homepage any or all of the following information pertaining to the "Substantial Change/Amendment". For a "Substantial Change/Amendment", one (1) public hearing will be held to allow for public comment and utilized in the event of "Substantial Change/Amendment" to the Five Year Consolidated Plan or any Annual Action Plan from a previous year. For this purpose, a minimum of fifteen (15) days will be made available prior to any substantial amendment(s) taking effect. During the entire fifteen (15) days, public comments will be welcomed, reviewed and incorporated into any document(s) if deemed necessary and proper. As part of any "Substantial Change/Amendment" a review of the environmental files will be completed to ensure that said "Substantial Change/Amendment" does not require a new environmental review to be completed. If a new environmental review is required, it will have to be included within any and all "Substantial Change/Amendment" paperwork. In addition to the environmental review(s), a new SF-424 will have to be included and sent to HUD as well as a new Budget Sheet and any other required paperwork. Depending on the program and funding circumstances there may be a need for further CDBG, HOME or other funding certifications. Depends on each situation and will be determined.

- 1) A minimum of fifteen (15) days will be allotted for public comment and review for any "Substantial Change/Amendment" unless otherwise over-written by the United States Department of Housing and Urban Development (HUD) for any special funding ie: COVID or Recovery/Stimulus Funding.
- 2) If any change to a previous or current CDBG or HOME program is less than 25% of a particular program year (inclusive of any and all program income funds) there shall be no need for a public notice, public hearing nor for any change to the Annual Action Plan other than addressing the numerical changes within the CDBG, HOME or other program funding. To this end, a new SF-424 as well as a new Budget Sheet would be submitted to HUD. If the change does not require any environmental review, a new environmental review need not be submitted.

E) CAPER:

The Town of Hamburg will publish in the Buffalo News or an "official" Town of Hamburg publication and on the Town of Hamburg's web-site within the Department of Community Development homepage any or all of the information pertaining to the CAPER and its possible viewing by the

public. The length of time the notice to citizens that the Consolidated Plan Annual Performance Report (CAPERS) is available for public comment and review will be a minimum of fifteen (15) days.

F) Community Hearings/Funding Requests:

The Town of Hamburg Department of Community will hold a minimum of six (6) public hearings to obtain the views of citizens on the proposed activities planned for an upcoming program year. The hearings will include intake on proposed housing and community development needs from anyone or any group including village governmental personnel. A minimum of one public hearing to review the previous program years performance with the CDBG, HOME or other program funding will be included within one of the six (6) hearings. The public hearings will be advertised within an "official" Town of Hamburg publication and on the Town of Hamburg's web-site within the Department of Community Development homepage or on the Town of Hamburg web site within the "Legal Notice" section. Also within said public hearing advertisement, it will be disclosed that any and all persons can request a "Community Development Block Grant Application for Funding" from the Town of Hamburg. Said funding application(s) can either be mailed to any and all persons simply by requesting an application(s) or it can be picked up at Hamburg Town Hall, Hamburg Community Development, Hamburg Village Hall, Blasdell Village Hall or by going to the Community Development website; www.townofhamburgny.gov/195/community-development The public hearings can be held at any of the following locations:

Hamburg Town Hall 6100 South Park Avenue Hamburg, New York 14075	Hamburg Community Development 6122 South Park Avenue Hamburg, New York 14075
Hamburg Village Hall 100 Main Street Hamburg, New York 14075	Blasdell Village Hall 121 Miriam Avenue Blasdell, New York 14219

All locations are accessible and any person(s) attending the public hearing requiring special considerations will be provided a contact for assistance in this regard. The Hamburg Town Board reserves the right to approve projects at its sole discretion after considering any and/or all public comments received whether verbal, written, or via e-mail to: CDpublichearing@townofhamburgny.gov.

G) Technical Assistance:

The Town of Hamburg Department of Community Development will provide technical assistance to any individual, group or organization regardless of income status pertaining to the Community Development Block Grant or Home Investment Partnership Program operated through the Town of Hamburg Department of Community Development. Technical assistance does not necessarily constitute funding to any of the individuals, groups or organizations. However, technical assistance does include assistance with the "Community Development Block Grant Application for Funding" from the Town of Hamburg Department of Community Development. Technical assistance can be in the form of phone assistance with questions about the program/application or as participation at a meeting where a legitimate/eligible applicant for funding is holding a hearing/meeting.

H) Complaint Resolution:

All complaints received by the Town of Hamburg regarding the Community Development Block Grant or Home Investment Partnership Program will be addressed through the Department of Community Development within fifteen (15) working days of receipt of the same. If the response from the Department of Community Development is deemed inappropriate by the source issuing said complaint, the Town of Hamburg will enlist the opinion and judgment of the Town of Hamburg Legal Department. If after Legal review, the response is still seemed inappropriate by the source issuing said complaint, the Town of Hamburg will enlist the opinion/judgment of the United States Department of Housing and Urban Development (HUD) for consideration.

I) **Funding Decisions:**

All funding decisions made by the Town of Hamburg for Community Development Block Grant, Home Investment Partnership Program or other special funding, ie: COVID or emergency/disaster funding, including any recaptures or amendments is the sole discretion of the Town of Hamburg. All other parties including government entities, the general public and any other government agencies shall understand that the ultimate final approval for project and funding awards is contingent on approval from the United States Department of Housing and Urban Development (HUD). Furthermore, if federal CDBG or HOME funding amounts are not authorized prior to the "draft" Consolidated and/or Action Plan process, estimated funding levels will be utilized using normal hearing time frames and citizen participation requirements listed within this document. Any funding levels shown within a "draft" plan will be marked as an estimate. A contingency provision of final funding amounts will be included within any Plan until a final federal funding authorization has been approved and allocated for use (HUD CPD Notice 2025-02).

J) **COVID-19/Natural Disasters:**

Public Participation during the COVID-19 response or natural disasters shall be adjusted as follows based upon the guidance and direction of the United States Department of Housing and Urban Development, the State of New York and any other governmental/health organization. Public notices for hearings shall be listed on the Town of Hamburg's website and on a social media platform. Said notices shall provide a minimum of five (5) days for public response to an official e-mail address of the Town of Hamburg Department of Community Development (CDpublichearing@townofhamburgny.gov), thus allowing for proper "social distancing" and non face-to-face contact. This will not be in effect when no pandemic or natural disaster is in place.

J) **MISCELLANEOUS:**

The Town of Hamburg Department of Community Development reserves the right to amend this Citizen Participation Plan throughout any program year in order to either make it easier for the public to have access to the towns programs or if there is found to be an omission that requires an immediate fix/change in a regulation pertaining to the CDBG, HOME or other funding/programs. Any/all comments pertaining to this 2025 Citizen Participation Plan can be addressed to the following:

Hamburg Community Development
6100 South Park Avenue
Hamburg, New York 14075
(716) 648-6216
Christopher Hull; Director; chull@townofhamburgny.gov
Timothy Regan; Assistant Director; tregan@townofhamburgny.gov

Updated: April 2025

Grantee SF-424's and Certification(s)

OMB Number 4343-0034
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
* 1. Type of Submission <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application		* 2. Type of Application: * If Revision, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision * Other (Specify):
* 3. Date Received: 06/06/2021		4. Applicant Identifier:
5a. Federal Entity Identifier: G-25-NC-36-0000		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
B. APPLICANT INFORMATION:		
* a. Legal Name: Town of Hamburg, New York		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 13-6002270		* c. UFI: 061048440000
d. Address:		
* Street: 6100 South Park Avenue Street2: * City: Hamburg County/Parish: * State: NY: New York Province: * Country: USA: UNITED STATES * Zip / Postal Code: 14075-3760		
e. Organizational Unit:		
Department Name: Community Development		Division Name:
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: M	* First Name: Clark, Joseph	
Middle Name:		
* Last Name: Clark		
Suffix:		
Title: Director of Community Development		
Organizational Affiliation:		
* Telephone Number: 716-048-2200		Fax Number:
* Email: clarkj@townofhamburg.ny.gov		

Application for Federal Assistance SF-424		
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>		
Type of Applicant 2: Select Applicant Type <input type="text"/>		
Type of Applicant 3: Select Applicant Type: <input type="text"/>		
* Other (specify): <input type="text"/>		
* 10. Name of Federal Agency: <input type="text" value="US Department of Housing & Urban Development"/>		
11. Assistance Listing Number: <input type="text" value="14,215"/>		
Assistance Listing Title: <input type="text" value="Community Development Block Grant/Entitlement Grants"/>		
* 12. Funding Opportunity Number: <input type="text"/>		
* Title: <input type="text"/>		
13. Competition Identification Number: <input type="text"/>		
Title: <input type="text"/>		
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Community Development Block Grant 2025 Grant: Public Facility projects; Housing Rehabilitation grants; Homeownership Assistance; Legal/Eviction Services; Housing Counseling; VEH Housing Services; Economic Development"/>		
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>		

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="445,150.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="100,000.00"/>
* g. TOTAL	<input type="text" value="545,150.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes", provide explanation and attach:

21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

** I AGREE

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Ext.: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

**Applicant and Recipient
Assurances and Certifications**

U.S. Department of Housing
and Urban Development

OMB Number: 2512-0144
Expiration Date: 09/30/2021

Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified the form for use for purposes of general compliance with 24 CFR §§ 1.6, 3.115, B.9(i), and 145.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.6, 3.115, B.9(i), or 145.25.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

Authorized Representative Name:

Prefix: *First Name:
Middle Name:
*Last Name:
Suffix:

*Title:

*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(c)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its legally designated governing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.) and implementing regulations at 24 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6121-407) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 881-409), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an apartment which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this declaration; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4301); and implementing regulations at 49 CFR part 24 and, as applicable, Section 107(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 6304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-L1, Disclosure Form to Report Lobbying. I certify that I shall require all subgrantees or all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes are excluded from coverage by the Hyde Amendment, but State-recognized Indian tribes and TDHEs established under State law are not restricted from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submit a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §§3729, 3002; 24 CFR §20.10(b)(1)(iii)).

*Signature:



*Date:



Form HUD-424-E (02/2021)

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan - It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Catherine A. Polyzanski
Signature of Authorized Official

5/21/25
Date

SUPERVISOR
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan – Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan – It is following a current consolidated plan that has been approved by HUD.

Use of Funds – It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2025, 2026, 2027 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force – It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Catherine A. Pylasynaki
Signature of Authorized Official

5/21/18
Date

Supervisor
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix - Alternate/Local Data Sources

1	Data Source Name 2016-2020 ACS - August 2024
	List the name of the organization or individual who originated the data set. US Census Bureau
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	What is the status of the data set (complete, in progress, or planned)?