

DRAFT 2026 Action Plan of the 2025-2029 Five-Year Consolidated Plan

PREPARED FOR THE

Erie County / Town of West Seneca Community Development
Block Grant Consortium, and the

Erie County / Town of Hamburg / Town of West Seneca Home
Consortium, and the

Town of Hamburg – Community Development
Entitlement Program

Submitted by:

The Erie County Department of Environment and Planning

HON. MARK C. POLONCARZ
COUNTY EXECUTIVE

DANIEL R. CASTLE
COMMISSIONER

January 9, 2026

FY 2026 Annual Action Plan

Table of Contents

Erie County 2026 Action Plan	1
AP-05 Executive Summary- 24 CFR 91.200(c), 91.220(b)	1
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)	16
AP-10 Consultation- 91.100, 91.200(b), 91.215(1)	17
AP-12 Citizen Participation	24
AP-15 Expected Resources- 24 CFR 91.420(b), 91.220(c)(1,2)	29
AP-20 Annual Goals and Objectives- 91.420,91.220(c)(3)&(e)	33
AP-35 Projects- 91.420, 91.220(d)	40
Erie County 2026 Budget.....	42
AP-38 Project Summary	43
AP-50- Geographic Distribution	57
AP-55 Affordable Housing-91.420,91.220(g)	59
AP-60 Public Housing- 91.420, 91.220(h)	61
AP-65 Homeless and Other Special Needs Activities	64
AP-75 Barriers to affordable housing -91.420,91.220(j)	69
AP-85 Other Actions	70
AP-90 Program Specific Requirements	76
Attachments	80
SF-424	86
• <i>CDBG</i>	
• <i>HOME</i>	
• <i>ESG</i>	
<i>Certifications</i>	

Town of Hamburg

FY 2026 Annual Action Plan	110
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SF-424

• <i>CDBG</i>

Certifications

Citizen Participation

Executive Summary

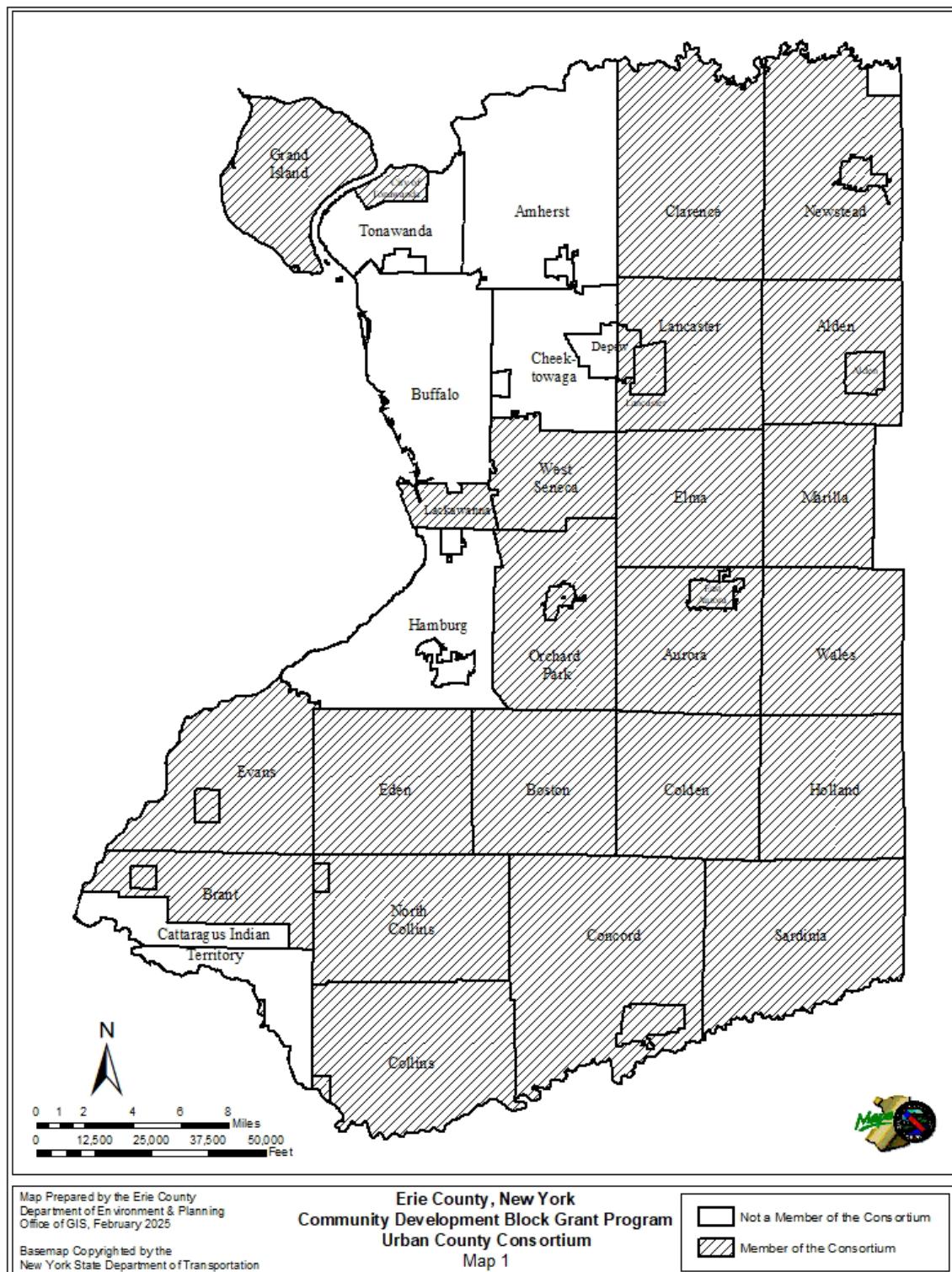
AP-05 Executive Summary - 91.200(c), 91.220(b)

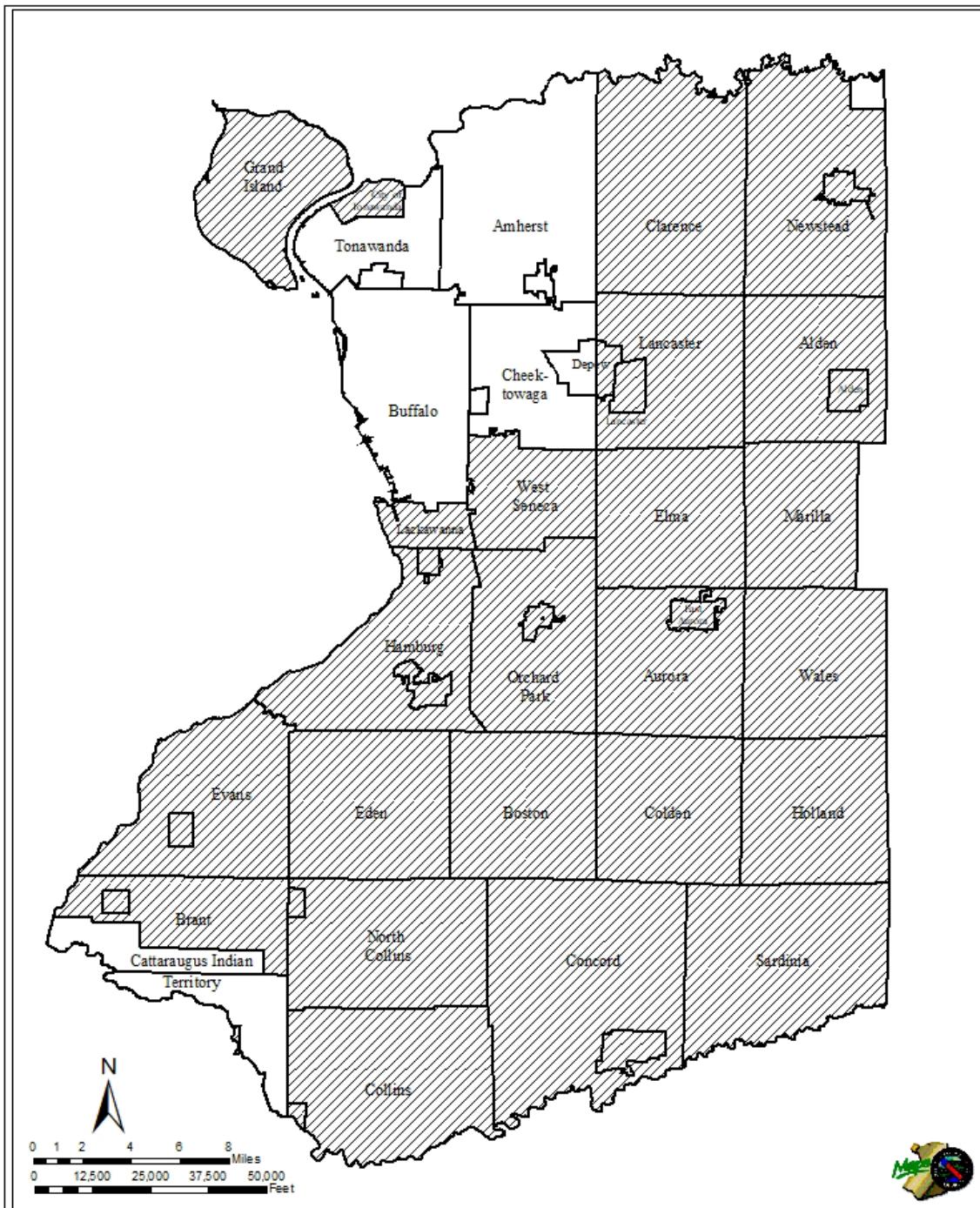
1. Introduction

The Erie County Community Development Block Grant (CDBG) Consortium is made up of 34 municipalities. The Erie County Department of Environment and Planning (DEP) administers the CDBG and Emergency Solutions Grant (ESG) Program grants on behalf of the CDBG Consortium communities. The DEP also administers the Erie County HOME Consortium, which is comprised of the 34 CDBG Consortium municipalities and the Town of Hamburg and its two villages—the Villages of Hamburg and Blasdell.

The Erie County CDBG Consortium and Erie County HOME Consortium are required to prepare this Five-Year Consolidated Plan (CP) for the CDBG, HOME and ESG federal grant programs in order to guide federal funding allocations for housing, community development and economic development activities within their communities. This CP covers the period from FY 2025 through FY 2029 (April 1, 2025 to March 31, 2029). This Action Plan for the 2026 program is Year 2 of the 5 Year Consolidated Plan.

Attached are Maps 1 and 2 of the consortium CDBG and HOME service areas. Also attached are Maps 3-6 that address geographic priorities.





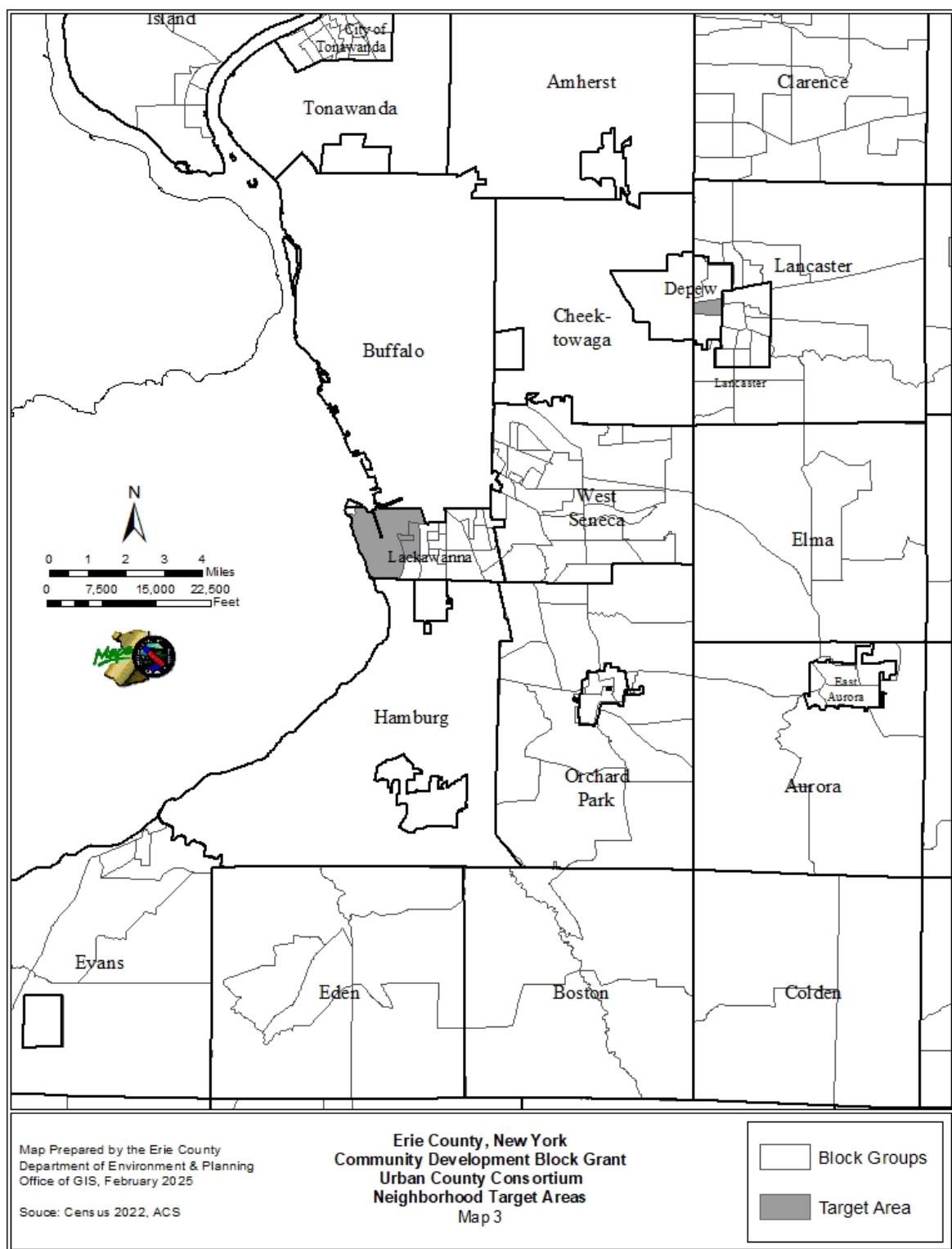
Map Prepared by the Erie County
Department of Environment & Planning
Office of GIS, February 2025

Basemap Copyrighted by the
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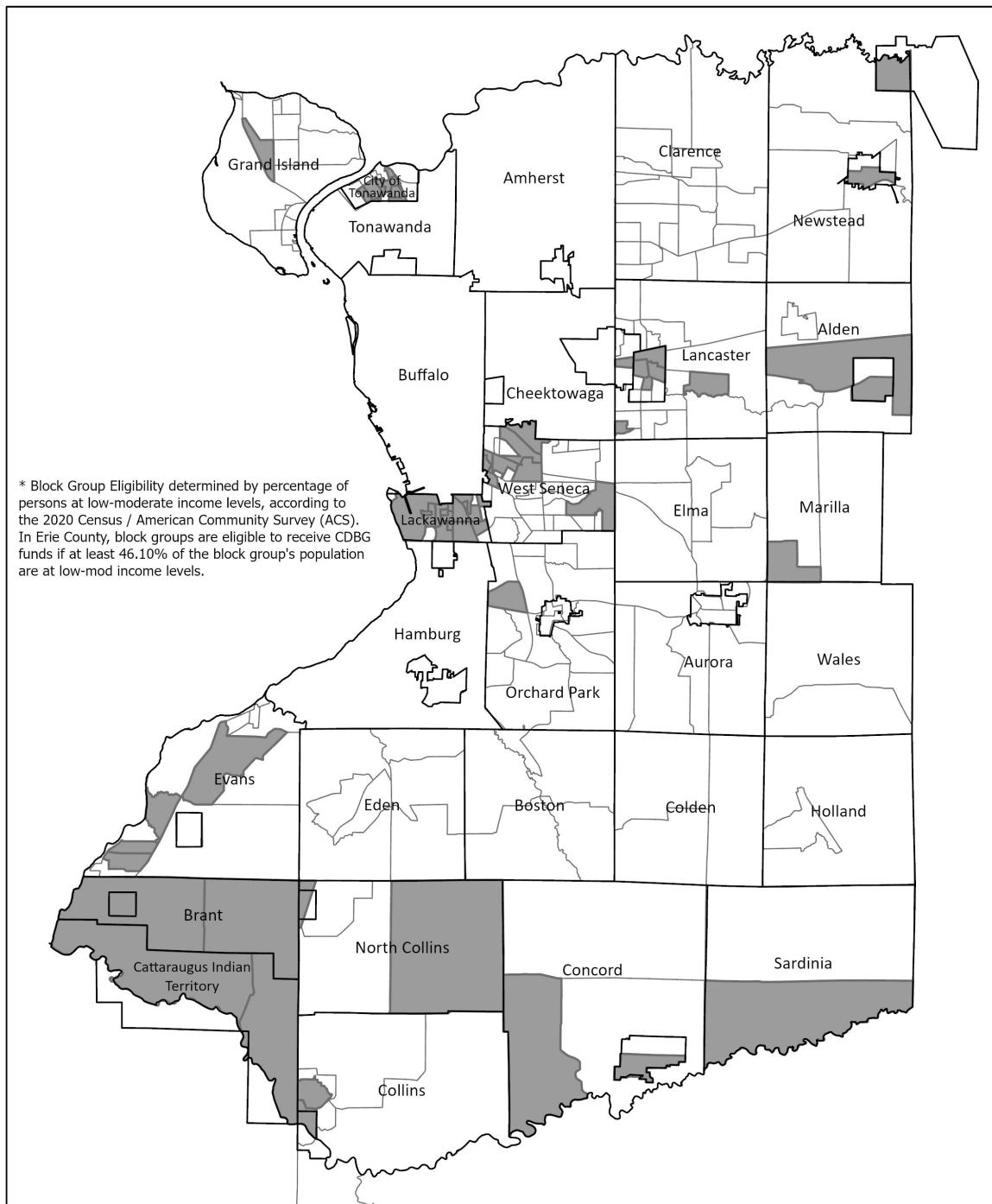
Erie County, New York
HOME Consortium
Map 2

White box: Not a Member of the Consortium
Hatched box: Member of the Consortium

Map 2- HOME Service Area



Map 3- Target Areas



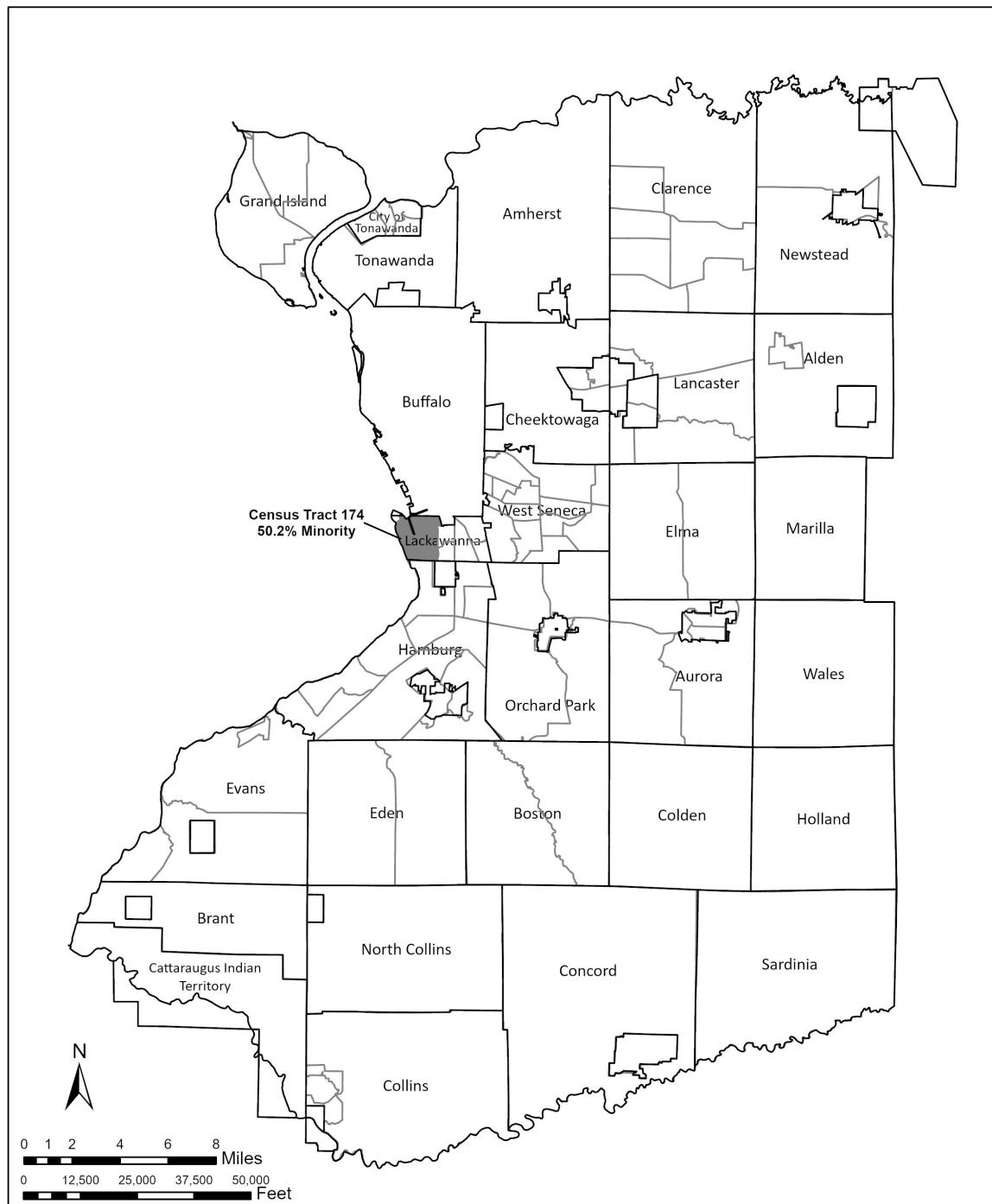
Map Prepared by the Erie County
Department of Environment & Planning
Office of GIS, February 2025

Source: HUD

Erie County, New York
Urban County Consortium:
2020 CDBG Eligible Block Groups
Map 4

2020 CDBG Eligible Areas
 Ineligible Areas

Map 4- Income Eligible Block Groups



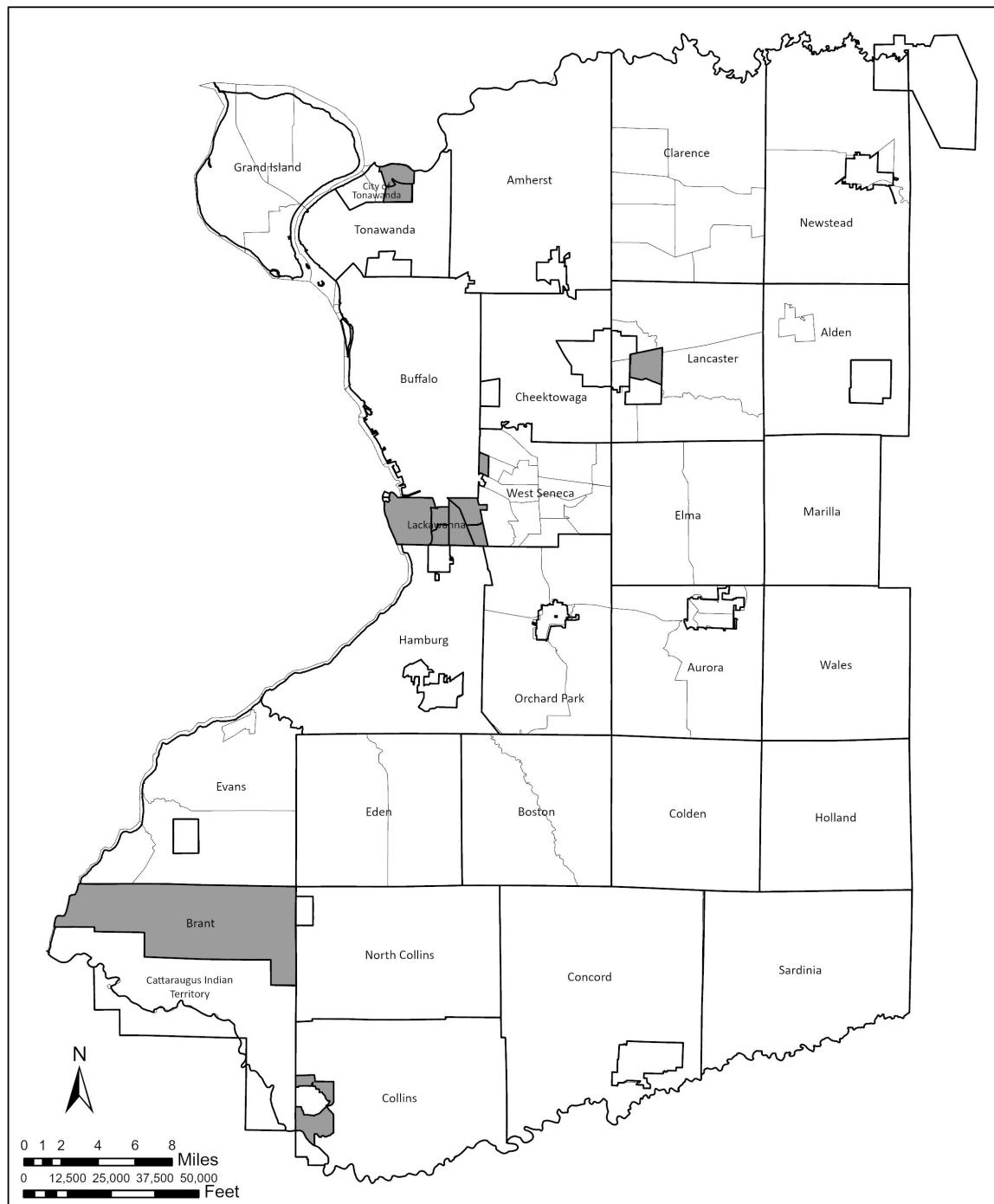
Map Prepared by the Erie County
Department of Environment & Planning
Office of GIS, February 2025

Source: 2020 Census Race and Ethnicity
Characteristics

Erie County, New York
Urban County Consortium:
Census Tracts with Substantial
Minority Population
Map 5

Under 50% Minority
Equal To or Greater Than 50% Minority

Map 5- Census Tracts with High Minority Concentration



Map Prepared by the Erie County
Department of Environment & Planning
Office of GIS, February 2025

Source: HUD

Erie County, New York
Urban County Consortium:
Census Tracts with High Concentration
of Low Income Residents
Map 6

Equal To or Greater Than
51% Low Income
 Under 51% Low Income

Map 6- Census Tracts with High Percentage of Low Income People

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2026 budget is attached. A positive trend is the significant amount of other funds \$2,515,725 and program income (approximately \$522,171) being combined with the Consortium's annual entitlement grant allocations. This further stretches federal dollars and allows the overall program to better address the high-priority areas. Below are highlights for the 2026 Program Year: Community Development Highlights:

Fourteen (14) community projects will be funded this year. This represents approximately 51% of the entitlement grant allocation. City of Lackawanna – Lackawanna Senior Center Improvements - \$149,841; Village of Gowanda – St. John's Park Improvement- \$150,000; Village of East Aurora – Hamlin Park Walkways - \$103,505; Town of Elma – Senior Center Improvements - \$37,421; Town of Holland – Water House Pump Improvements – \$150,000; Town of Newstead – Furniture Replacement for Akron/Newstead Senior Center- \$9,500; Village of Springville – Waverly Street Waterline Replacement- \$150,000; Village of Alden – Street Improvement Project- \$150,000; Town of Evans – Evans Waterfront Park Pavilion Restoration Project - \$150,000; City of Tonawanda – Sidewalk Replacement - \$150,000; Town of West Seneca – Improvements to Senior Center - \$150,000; Village of Depew – St. James Playground Improvements - \$150,000; Town of Brant – Brant Town Hall Playground Replacement Project - \$100,000; Various Communities - Rural Transit Transportation Service: \$285,000.

A substantial commitment of CDBG funds will again be allocated to the Rural Transit Services Project. The service is offered in twenty-five municipalities and provides van transportation to doctor offices, shopping centers, senior centers and other destinations for low-income and seniors.

Housing and Emergency Solutions Programs Highlights

Over 43 households are on the wait list for the Housing Rehabilitation Program and 32 are on the Mobile Home wait list. Priority is given to those residing in target areas and older housing stock, as well as those having lower incomes.

The Emergency Solutions Grant Program will provide homeless and at risk of being homeless individuals and families assistance to find/maintain permanent housing. Other services include case management, housing search and legal services. Economic Development Highlights-Infrastructure improvements and reconstructions include Village of North Collins-Smart Growth Initiative-Main Street and adjacent streets Sidewalk/Streetscape Improvements- \$200,000.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The following provides a brief summary highlighting key achievements in the four major funding categories.

1. Administration: Erie County successfully adhered to several key indicators established by HUD to gauge an entitlement's performance. One of those indicators was the timeliness standard where Erie County met its goal. As of January 31, 2026, Erie County had achieved the timeliness standard by having 1.27 times the dollar amount of the 2025 CDBG grant award in the unexpended category.

Other key administrative achievements were the expenditure of 98.74% of all non-planning/admin monies on activities targeted to benefitting low/moderate income people, as well as staying under the required administrative cap of 20% by expending 19.59% on planning and administration and achieving staying under the required public services cap of 15% by expending 11.71% on public service expenses.

2. Community Projects: 11 projects were completed in 2025 benefitting low/moderate income people. The Rural Transit Service Program continued its successful efforts by helping 1,615 seniors and low-income people gain better access to shopping and medical appointments.

3. Economic Development: One Smart Growth projects was completed in 2025 in the Village of North Collins/Main Street improvements. The projects will assist low income populations in the Town of Evans, City of Lackawanna and Village of North Collins. In 2025 the Commercial Center Improvement Program (CCIP) continued with no businesses completed with exterior rehabilitation with CDBG funding assistance due to Erie County's general fund budget of a full grant for storefront improvements through their Storefront Revitalization Program. The CCIP program will begin again with CDBG 50% matching funds in the 2026 PY in the Village of Akron.

4. Housing: Taken together, the Erie County housing programs assisted 83 low/mod income households in 2025. Goals were achieved in the mobile home repair and owner occupied rehab programs. The prioritized wait list for the popular Housing Rehabilitation Program begun in 2005 is now resulting in more homes being completed in the two older areas of the Consortium. In 2025, 29% of all County rehab cases were in the City of Lackawanna, and Village of Depew target areas.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Consortia's Citizen Participation Plan (CPP) sets forth the procedures and policies the Consortia will use to encourage citizen participation in the development, operation and reporting of their annual CDBG, ESG and HOME grants and the Consolidated Plan. Citizens are encouraged to participate in the development of the Consolidated and Annual Plans, any substantial amendments to the Plans, and the CAPER. This participation by low- and moderate-income persons, particularly those living in designated target areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods, is particularly encouraged as is the participation of all residents, including seniors, minorities and persons with disabilities.

By implementing the CPP, the Consortia will become more aware and sensitive to low- and moderate-income citizens' needs. It will also afford the Consortia an opportunity to better inform the public of the purpose of the CDBG, ESG and HOME grants and the grant allocation process, and ensure that selected projects are meeting the needs of these constituents.

Participation Prior to the solicitation and selection of the 2026 CD projects, a series of meetings were held. County staff met with representatives of municipalities, community-based organizations and housing-related agencies to encourage citizen participation in a series of county-wide public forums. The meetings were also used to inform the public about the CDBG, HOME, and ESG programs, the type of projects eligible for funding, and the project selection process. Articles appeared in local and community newspapers informing the public about the county-wide forums and encouraging their participation.

These forums for residents of the 37 municipalities were held on September 16, 17, and 22, 2025, for the purpose of receiving input from them on needs in human services, housing, community/neighborhood improvements, and economic development. There will also be three meetings held to receive comments on the 2026 Draft Action Plan. These meetings will be held on January 20 in the City of Lackawanna, January 21 in Town of Hamburg and January 22 in the City of Tonawanda. A public notice that was published for the 2026 Draft Action Plan is attached. Notice of availability of the FY 2026 Action Plan for public review and comments were published in the Buffalo News on January 9, 2025, and the Buffalo Challenger on January 12, 2026.

Each municipality in the Consortium also held virtual community development public hearings. Please refer to Section AP-85- Other Actions- to review criteria for changes to the draft budget based on final funding allocations from HUD.

Also attached is a table showing all of the dates and times of each municipal public hearing.

CITIZEN PARTICIPATION PROCESS

2025-2026

ERIE COUNTY CDBG URBAN CONSORTIUM

SPONSOR	DATE	TIME	LOCATION	COMMENTS
ERIE COUNTY-				
CONSORTIUM-WIDE	9/16/2025	7:00 P.M.	TOWN OF CONCORD	
CITIZEN FORUMS:	9/17/2025	6:30 P.M.	CITY OF LACKAWANNA	
	9/18/2025	7:00 P.M.	VILLAGE OF LANCASTER	
	9/22/2025	6:30 P.M.	TOWN OF HAMBURG	
MUNICIPAL HEARINGS:				
LACKAWANNA, C.	10/27/2025	11:00 A.M.	CITY HALL COUNCIL CHAMBERS	
TONAWANDA,C.	10/8/2025	5:00 P.M.	COUNCIL CHAMBERS	
ALDEN, T.	10/6/2025	6:05 P.M.	TOWN HALL	
ALDEN, V.	10/14/2025	6:35 P.M.	VILLAGE HALL	
AURORA, T.	10/14/2025	6:30 P.M.	AURORA MUNICIPAL CENTER MEETING ROOM	
EAST AURORA, V.	10/20/2025	7:00 P.M.	VILLAGE HALL	
BOSTON, T.	10/15/2025	7:30 P.M.	TOWN HALL	
BRANT, T.	9/9/2025	7:45 P.M.	TOWN HALL	
FARNHAM, V.	8/19/2025	7:30 P.M.	VILLAGE HALL	
CLARENCE, T.	10/8/2025	10:20 A. M.	TOWN HALL	
COLDEN, T.	10/9/2025	7:00 P.M.	TOWN HALL	
COLLINS, T.	10/14/2025	7:30 P.M.	TOWN HALL	
GOWANDA, V.	10/14/2025	6:05 P.M.	VILLAGE HALL	
CONCORD, T.	10/8/2025	6:15 P.M.	TOWN HALL	
SPRINGVILLE, V.	10/6/2025	7:00 P.M.	VILLAGE MUNICIPAL BUILDING	
EDEN, T.	10/22/2025	7:15 PM	TOWN HALL	
ELMA, T.	10/22/2025	7:00 P.M.	TOWN HALL	
EVANS, T.	10/15/2025	6:10 P.M.	TOWN HALL	
ANGOLA, V.	10/21/2025	6:10 P.M.	VILLAGE HALL	
GRAND ISLAND, T.	10/21/2025	8:00 P.M.	TOWN HALL	
HOLLAND, T.	10/8/2025	7:00 P.M.	TOWN HALL	
LANCASTER, T.	10/20/2025	7:05 P.M.	TOWN HALL	
LANCASTER, V.	10/14/2025	7:15 P.M.	VILLAGE HALL	
DEPEW, V.	10/14/2025	7:00 P.M.	VILLAGE HALL	
MARILLA, T.	10/16/2025	7:00 P.M.	TOWN HALL	
NEWSTEAD, T.	9/22/2025	7:25 P.M.	TOWN HALL	
AKRON, V.	10/6/2025	7:00 P.M.	VILLAGE HALL	
NORTH COLLINS, T.	10/13/2025	5:30 P.M.	TOWN HALL	
NORTH COLLINS, V.	10/20/2025	6:30 P.M.	VILLAGE MUNICIPAL OFFICE	
ORCHARD PARK, T.	10/17/2025	7:00 P.M.	MUNICIPAL CTR.-BOARD ROOM	
ORCHARD PARK, V.	10/27/2025	7:00 P.M.	MUNICIPAL CTR.	
SARDINIA, T.	11/13/2025	6:30 P.M.	TOWN HALL	
WALES, T.	9/9/2025	7:00 P.M.	COMMUNITY CENTER	
WEST SENECA, T.	9/22/2025	6:00 P.M.	TOWN HALL-COURT	
HAMBURG, T.	9/22/2025	6:30 P.M.	COMMUNITY DEVELOPMENT OFFICE	
HAMBURG, T.	9/29/2025	6:30 P.M.	COMMUNITY DEVELOPMENT OFFICE	
HAMBURG, T.	10/7/2025	6:30 P.M.	COMMUNITY DEVELOPMENT OFFICE	
HAMBURG, T.	10/20/2025	6:30 P.M.	COMMUNITY DEVELOPMENT OFFICE	
COORDINATING COMMITTEE	2/5/2026	10:00 A.M.	1004 RATH BLDG., BUFFALO	
CONSOLIDATED	1/20/2026	6:30 P.M.	LACKAWANNA PUBLIC LIBRARY	
PLAN ("DRAFT")	1/21/2026	6:30 P.M.	HAMBURG TOWN HALL	
PUBLIC HEARINGS	1/22/2026	7:00 P.M.	CITY OF TONAWANDA	

Citizen Participation Hearing Dates

PUBLIC NOTICE

Erie County/Town of Hamburg
2026 Action Plan of the
Five-Year Consolidated Plan 2025-2029
Community Development Block Grant (CDBG),
Home Investment Partnership Grant (HOME) and
Emergency Solutions Grant (HESG)

The Erie County Department of Environment and Planning, on behalf of the Erie County Community Development Block Grant and HOME Investment Partnership Consortia, has prepared a draft 2026 Action Plan. The document outlines the Consortia's goals and objectives relative to housing, economic development, community development and homeless issues with specific attention given to the needs of low/moderate households residing in the Consortia communities. The following municipalities comprise the CDBG Consortium: Cities of Lackawanna and Tonawanda; Towns of Alden, Aurora, Boston, Brant, Clarence, Colden, Collins, Concord, Eden, Elma, Evans, Grand Island, Holland, Lancaster, Marilla, Newstead, North Collins, Orchard Park, Sardinia, Wales and West Seneca; Villages of Akron, Alden, Angola, Depew, East Aurora, Farnham, Gowanda, Lancaster, North Collins, Orchard Park and Springville. The HOME Consortium includes the above communities as well as the Town of Hamburg and the Villages of Blasdell and Hamburg.

The Action Plan for 2026 provides a basis for assessing performance against the Consolidated Plan and identifies specific projects for 2026. It also serves as a combined application for federal funds under three (3) of the U.S. Department of Housing and Urban Development's (HUD) formula grant programs, including CDBG, HOME and HESG.

The following HUD entitlement grants are anticipated: Erie County CDBG of \$2,994,630 plus estimated program income of \$350,000; Town of Hamburg CDBG of \$445,160 plus estimated program income of \$100,000; Erie County HOME Grant of \$921,686 plus estimated program income and/or recaptured funds of \$225,000; and Erie County Emergency Solutions Grant of \$234,812.

Erie County Public Hearing Notice- 1

A public comment period on the draft Action Plan, will be held from January 9 to February 11, 2026. Hard copies of the draft Action Plan and Consolidated Plan are available at the following locations: Erie County Department of Environment and Planning, Edward A. Rath Building, 95 Franklin Street – Room 1053, Buffalo; Public Libraries in the Villages of Akron, Angola and Hamburg; the Towns of Concord, Lancaster and Hamburg (Lakeshore Library); and the Cities of Buffalo (Main Branch), Lackawanna and Tonawanda; Lackawanna City Hall; Tonawanda Municipal Building, Hamburg Town Hall, Hamburg Community Development Office at 6122 South Park Avenue, Lackawanna Municipal Housing Authority and Tonawanda Municipal Housing Authority. The Draft Action Plan can be viewed on Erie County's web site at www.erie.gov and Town of Hamburg's Draft Action Plan can be viewed on its website at www.townofhamburgny.gov/195/community-development

PUBLIC HEARINGS

Three (3) public hearings have been scheduled to discuss the draft Action Plan for 2026, the 2025-2029 Five Year Consolidated Plan. The public is encouraged to attend these hearings, which will be held on Tuesday, January 20 at 6:30 p.m., Lackawanna Public Library, Community Room, 560 Ridge Road, Lackawanna; Wednesday, January 21 at 6:30 p.m., Hamburg Community Development, 6122 South Park Avenue, Hamburg and Thursday, January 22 at 7:00 p.m., City of Tonawanda, Court Room, 200 Niagara Street, Tonawanda. Meeting rooms are fully accessible. Persons with special needs and who are unable to attend any of the three (3) public meetings can participate in a Public Hearing Meeting and Conference Call on Wednesday, January 21 at 9:30 am at the Edward A. Rath County Office Building, 95 Franklin Street, 10th Floor, Room 1004, Buffalo, NY.

To participate by phone, call 716-858-2468; enter Meeting Number 6409 and Attendee Access Code 3690. Written comments on the draft Action Plan and Consolidated Plan will be accepted through February 9, 2026, by Paul D'Orlando, Principal Contract Monitor, Erie County Department of Environment and Planning, Edward A. Rath County Office Building, 95 Franklin Street – 10th Floor, Buffalo, NY 14202, by fax at 716- 858-7248 or by e-mail to Paul.D'Orlando@erie.gov Written comments on Hamburg's draft Action Plan will be accepted through February 9, 2026 by the Town of Hamburg Department of Community Development, 6100 South Park Avenue, Hamburg, NY 14075 or by e-mail to cdpublichearing@townofhamburgny.gov

Erie County Public Hearing Notice- 2

Non-English-speaking persons or persons with Limited English Proficiency or special needs should contact Mariely Ortiz at (716) 858-1916 or Mariely.Ortiz@erie.gov for further assistance or to access documents in another language.

Para asistencia en Español, se puede contactar a Mariely Ortiz (716) 858-1916 o Mariely.Ortiz@erie.gov

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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

7. Summary

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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	ERIE COUNTY	Environment & Planning
HOME Administrator	ERIE COUNTY	Environment & Planning
ESG Administrator	ERIE COUNTY	Environment & Planning

Table 1 – Responsible Agencies

Narrative

The Erie County HOME Consortium is comprised of thirty-seven municipalities, while the Erie County Community Development Block Grant (CDBG) Consortium has thirty-four members. The Town of Hamburg and the two villages located therein are only members of the HOME entity. The Erie County Department of Environment and Planning (DEP) has been administering the Consortia since the late 1970s via three-year cooperation agreements. A memorandum of understanding co-signed by Erie County and member communities in 1998 is the guiding document that directs funding allocations and other administrative matters.

Consolidated Plan Public Contact Information

Paul J. D'Orlando
Principal Contract Monitor
County of Erie
Department of Environment & Planning
County Office Building

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The Erie County Community Development Block Grant (CDBG) Consortium, Amherst, Cheektowaga, and Tonawanda 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)).

The Consortia developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, stakeholder meetings, in-person interviews, and telephone interviews. Furthermore, the DEP implements a range of affordable housing and community development activities, including administration of the CDBG, ESG 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. During the preparation of the CP, the Consortia consulted with many entities.

The primary role of private industry in Consortia activities are contractors to the housing rehabilitation cases undertaken annually as well as the community projects carried out with CDBG, ESG and HOME funding. Various commercial banks in the region are active participants in the affordable housing delivery system and serve on Consortia project committees. Financial assistance through the banking community is often used to leverage CDBG and HOME dollars in constructing new senior housing projects.

Erie County 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.

Homeless Alliance of Western New York (HAWNY) is the NY508-Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC lead. Erie County and other CoC members under the leadership of HAWNY utilizes a coordinated entry system and standard assessment—Vulnerability Index-Service Prioritization Decision Assistance Tools (VI-SPDATs). Homelessness is less concentrated in the Erie Consortia municipalities, and there are no emergency shelters located within the Consortia, the county funded Rapid rehousing (RRH) program utilizes the coordinated entry system and coordinated with other RRH programs funded within the CoC to prioritize people within the consortia and serving those who are most in need. This entails providing apartments to homeless individuals and families who present only moderate barriers to achieving housing stability. The CoC Youth Taskforce focuses on creating community priorities to end youth homelessness. The annual Point in Time Count surveys the homeless to identify the number in need, demographic information, and the changing landscape. All information gathered is used to maintain a database of services utilized by the chronically homeless. These projects, sponsored by HAWNY, have produced an Annual Homeless Summary Brief and established goals that guide planning to end homelessness in the broader Erie County community. Among the priorities, the Plan sets for the community are permanent housing for the chronically homeless and permanent housing for clients dealing with mental health and/or substance abuse issues. During the 2025 Point in Time Count there were 75 chronically homeless individuals identified within Erie County, which is an increase from 2024 and significantly higher than previous years. The high number of homeless individuals is because of higher utilization of Code Blue/emergency weather shelters and temporary shelters along with a reduced number of affordable apartments. We have continued prioritizing people who are most vulnerable and have the longest homeless history to prevent anyone becoming chronically homeless.

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 Section 8 rental assistance program for all of Erie County (except for the City of Buffalo) and provides the greatest amount of housing and credit counseling for individuals and families, while Buffalo Urban League offers legal assistance as well as credit counseling for those households at risk of mortgage default or foreclosure.

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

The performance standards for activities funded under the County ESG Program were developed by the Homeless Alliance for WNY, the Continuum of Care (CoC). Staff for the CoC meets with local government staff and homeless service providers to determine the performance standards for the homeless rapid re-housing programs and the homelessness prevention programs that will be administered in the five-county service region. Many of these homeless service providers are active in the provision of transitional, supportive, and permanent housing for previously homeless individuals.

Erie County's Department of Environment & Planning (DEP) follows the CoC written standards, which details program policies and procedures, HMIS requirements, coordinated entry procedures and performance standards. The performance standards for activities funded under the County's ESG program were developed by the CoC. Staff for the CoC met with local government staff and homeless service providers to determine the performance standards for all programs including the homeless rapid re-housing programs and the homelessness prevention programs. Homeless Alliance of Western New York, the lead of the CoC and Homeless Management Information System (HMIS), administers the data collection and produce project and system performance quarterly.

HAWNY produces an Annual Homeless Assessment Report and Longitudinal System Analysis. DEP utilizes these reports along with the Annual Point-In Time count to set up program priority and evaluate funded programs using the performance report.

Erie County Department of Environment and Planning, along with the CoC, will evaluate the outcomes of activities assisted by the County's ESG funds. Data collected from HAWNY's Homeless Management Information System (HMIS) will be used to determine if agencies funded with ESG funds are meeting their performance goals.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Lackawanna Municipal Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The housing authority was consulted by interview regarding the needs of public housing residents.
2	Agency/Group/Organization	Tonawanda Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The housing authority was consulted by interview regarding the needs of public housing residents.
3	Agency/Group/Organization	ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the economic needs of Erie County.
4	Agency/Group/Organization	Erie Co. Dept. of Social Services
	Agency/Group/Organization Type	Services - Various Social
	What section of the Plan was addressed by Consultation?	Human Services Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of social services clients in Erie County.
5	Agency/Group/Organization	Erie Co. Dept. of Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of senior citizens in Erie County.
6	Agency/Group/Organization	Erie Co. Dept. of Mental Health
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Human Services Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of mental health clients in Erie County.
7	Agency/Group/Organization	HOMELESS ALLIANCE OF WESTERN NEW YORK
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the homeless population in Erie County.
8	Agency/Group/Organization	Restoration Society, Inc.
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the homeless population in Erie County.
9	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
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the rental housing population in Erie County.
10	Agency/Group/Organization	BELMONT SHELTER CORP
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview to obtain information on the needs of the rental housing population in Erie County.

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

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		

Table 3 – Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The development of the Erie County Urban Consortium / Town of Hamburg 2026 Action 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 Consortium 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.

Erie County hosted four community forums in September 2025. Articles appeared in local and community newspapers informing the public about the forums and encouraging their participation. In addition, the 34 municipalities that make up the Erie County CDBG Consortium are required annually to advertise and hold public hearings. During September and October of 2025, each municipality held a public hearing in its community to obtain suggestions on projects that meet low/moderate income population needs, prevent slum and blight, and/or meet urgent community needs. The forums were used both to solicit information on needs and to provide information about the CDBG, HOME, and ESG programs, the type of projects eligible for funding, and the project selection process.

The public comment period on the Draft 2026 Action Plan will extend from January 9 to February 12, 2026. Public hearings will be held on January 20, 21, and 22 to accept comments on the draft. All hearings were advertised in the Buffalo News and the Buffalo Criterion and posted on Erie County's website.

A summary table of all the meetings held during the 2026 action plan citizen participation process is included on the following page. 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 persons 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.

An amendment to the Action Plan will be required if any project funding is added for either the CDBG, HOME, HOME ARP or ESG grants that is in excess of \$150,000. The citizen participation process will remain the same for the amendment as would be for the Action Plan.

Revolving Loan (RL) funds may be converted to Program Income (PI) funds each year for the purpose of drawing administrative funds from Program Income where the administrative expenses are no more than 20% of the combined RL and PI funds received in any given year.

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	Internet Outreach	Non-targeted/broad community	Citizen Forums were held on Tuesday, September 16, 2025 in the Town of Concord; Wednesday, September 17, 2025 in the City of Lackawanna and Thursday, September 18, 2025 in the Village of Lancaster; Monday September 22, 2025 Town of Hamburg.			

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	Public Meeting	Non-targeted/broad community	Each of the 34 municipalities that make up the Erie County Consortium held public hearings in their respective communities to obtain input from residents on community development needs.			
3	Newspaper Ad	Non-targeted/broad community	Notice of availability of the FY 2025 Action Plan for public review and comments was published in the Buffalo News on January 9, 2026, and the Buffalo Challenger on January 15, 2026.			
4	Internet Outreach	Non-targeted/broad community	The FY 2024 Action Plan was posted on Erie County's website on January 9, 2026.			

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)
5	Public Comment Period	Non-targeted/broad community	The PY 2025 Action Plan will be on public display from January 9, 2026, through February 11, 2026, on Erie County's website and at libraries throughout Erie County			

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	Public Meeting	Non-targeted/broad community	Erie County held Public Hearings on Tuesday, January 20, 2026, at the City of Lackawanna; Wednesday, January 21, 2026 at the Town of Hamburg; Thursday, January 22, 2026 at City of Tonawanda and a Conference Call on Wednesday, January 21, 2026, to present the 2025 Action Plan and received no comments from the public.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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	2,994,630.00	462,000.00	0.00	3,456,630.00	10,369,890.00		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	921,686.00	225,000.00	0.00	1,146,686.00	3,440,058.00		

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	234,812.00	0.00	0.00	234,812.00	704,436.00	

Table 2 - 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

In 2026, projects funded through Erie County's CDBG allocation will leverage \$2,038,724 in matching funds. In the 2025 program year, projects that were recipients of non-HUD resources that addressed the housing and infrastructure needs identified in the 2025-2029 Consolidated Plan had an approximate investment of \$4 million. The funding sources for these projects included; USDA – Housing Rehabilitation Program, Lackawanna Community Development Corporation – (LCDC) Housing Rehab Program- New York State Affordable Housing Corporation, Lead Poisoning Prevention – Erie County Dept. of Health, Community Foundation of Greater Buffalo- U.S. Department of HUD, NYS Dept. of Health, Community Foundation of Greater Buffalo, USDA – Guaranteed Mortgage Loan – First Time Homebuyers Loan Program- United States Dept. of Agriculture Section 502/504 Guaranteed. Similar matching amounts from these various sources are expected to continue within the 2026 Calendar Year.

The County is required to provide a match for federal funds received under the HOME Program. The County will continue to provide Payment in Lieu of Taxes for rental housing that is developed to serve low income households in Erie County. The difference between the full assessed value

for property tax and the amount paid under the PILOT Payment Schedule will be used by the County for the HOME match.

Agencies receiving ESG funds under the County ESG Program will provide a portion of the required ESG match. The County will also use the financial assistance and services the County Department of Social Services provides to the homeless as a match.

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

Buffalo Erie Niagara Land Improvement Corporation (BENLIC) is a resource to the Consortium that identifies units vacant parcels within the community that can undergo foreclosure, rehabilitation, and resale as affordable housing. BENLIC reports an average cost of approximately \$225,000 to bring an individual housing unit on-line, so the math becomes difficult based on affordability standards, without public funding support. That said BENLIC commenced or continued rehabilitating five (5) properties funded in part by the Land Bank Community Revitalization Initiative 4.2 grant through Enterprise Community Partners, Inc. "Round 4.2" of NY Attorney General Grant funds. These properties are blighting proximate property and neighborhoods at-large. In addition, the Corporation completed constructing three (3) single family homes on a single vacant lot improving the fabric of a historic neighborhood that has not seen new construction in over twenty (20) years.

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	Water/Sewer/Drainage Improvements CD-1.1	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$308,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1367 Persons Assisted
2	Sidewalk Improvements CD-1.2	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$154,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4510 Persons Assisted
3	Road Improvements CD-1.3	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$154,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 495 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Building and ADA Improvements CD-2.1	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$106,505.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1032 Persons Assisted
5	Parks/Open Space Facility Improvements CD-2.2	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$462,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2875 Persons Assisted
6	Senior Center Improvements CD-2.3	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$357,921.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4871 Persons Assisted
7	Transportation CD 3.1	2025	2029	Non-Housing Community Development		Infrastructure (Community Development)	CDBG: \$289,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 1651 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Fair Housing Services CD 3.2	2025	2029	Non-Housing Community Development		Public Services	CDBG: \$69,436.00	Public service activities other than Low/Moderate Income Housing Benefit: 1175 Persons Assisted
9	Administration CD-5.1	2025	2029	Administration		Planning/Administration	CDBG: \$508,503.00 HOME: \$92,168.00 ESG: \$17,610.00	Other: 1 Other
10	Micro-Loan Program ED-4.1	2025	2029			Business Development	CDBG: \$112,000.00	Businesses assisted: 5 Businesses Assisted
11	Owner Occ. Deferred Loan Program H-1.1	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$405,000.00 HOME: \$678,269.00	Homeowner Housing Rehabilitated: 51 Household Housing Unit
12	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$75,000.00 HOME: \$123,939.00	Homeowner Housing Rehabilitated: 12 Household Housing Unit
13	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3	2025	2029	Affordable Housing		Housing Rehabilitation	HOME: \$114,058.00	Homeowner Housing Rehabilitated: 7 Household Housing Unit
14	Emergency Repair Program H-1.4	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$175,000.00	Homeowner Housing Rehabilitated: 12 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	Rental Rehabilitation Program H-1.5	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$71,265.00	Rental units rehabilitated: 6 Household Housing Unit
16	Mobile Home Repair Program H-1.6	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$86,000.00	Homeowner Housing Rehabilitated: 14 Household Housing Unit
17	Utility Connection Program H-1.7	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$50,000.00	Homeowner Housing Rehabilitated: 7 Household Housing Unit
18	Housing Rehab - Lead Remediation Program H-1.9	2025	2029	Affordable Housing		Housing Rehabilitation	CDBG: \$73,000.00	Homeowner Housing Rehabilitated: 5 Household Housing Unit
19	Affordable Housing - CHDO Projects H-2.1	2025	2029	Affordable Housing		Affordable Housing	HOME: \$138,252.00	Direct Financial Assistance to Homebuyers: 2 Households Assisted
20	Homeless Needs - Rapid Re-Housing Program ESG-1.1	2025	2029	Homeless		Homeless Assistance	ESG: \$103,601.00	Tenant-based rental assistance / Rapid Rehousing: 23 Households Assisted
21	Homeless Needs - Homeless Prevention Prgm ESG-1.2	2025	2029	Homeless		Homeless Assistance	ESG: \$103,601.00	Homelessness Prevention: 20 Persons Assisted
22	Homeless Needs - Data Collection ESG-1.3	2025	2029	Homeless		Homeless Assistance	ESG: \$10,000.00	Other: 1 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Water/Sewer/Drainage Improvements CD-1.1
	Goal Description	Waterline improvements in the Town of Holland and Village of Springville.
2	Goal Name	Sidewalk Improvements CD-1.2
	Goal Description	Sidewalk improvements in the City of Tonawanda.
3	Goal Name	Road Improvements CD-1.3
	Goal Description	Road improvements in the Village of Alden.
4	Goal Name	Public Building and ADA Improvements CD-2.1
	Goal Description	ADA improvements in the Village of East Aurora.
5	Goal Name	Parks/Open Space Facility Improvements CD-2.2
	Goal Description	Park and recreation improvements in the Villages of Gowanda and Depew and the Town of Evans.
6	Goal Name	Senior Center Improvements CD-2.3
	Goal Description	Senior center improvements in the City of Lackawanna and Towns of Elma, Newstead and West Seneca.
7	Goal Name	Transportation CD 3.1
	Goal Description	Rural Transit service. Provides transportation for senior citizens and low income individuals in 18 towns.

8	Goal Name	Fair Housing Services CD 3.2
	Goal Description	Fair housing services provided by Belmont Housing Resources and Housing Opportunities Made Equal (HOME) organizations.
9	Goal Name	Administration CD-5.1
	Goal Description	Administrative services for the management of the CDBG, HOME and ESG grants.
10	Goal Name	Micro-Loan Program ED-4.1
	Goal Description	Micro/Loan Grant assistance for income eligible small busiensse owners.
11	Goal Name	Owner Occ. Deferred Loan Program H-1.1
	Goal Description	Homeowner housing rehabilitation loan program. Consortium wide.
12	Goal Name	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	Goal Description	Homeowner housing rehabilitation loan program in the Town of West Seneca.
13	Goal Name	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3
	Goal Description	Homeowner housing rehabilitation loan program in the Town of Hamburg.
14	Goal Name	Emergency Repair Program H-1.4
	Goal Description	Homeowner emergency housing rehabilitation loan program. Consortium wide.
15	Goal Name	Rental Rehabilitation Program H-1.5
	Goal Description	Rental property owners housing rehabilitation loan program. Consortium wide.

16	Goal Name	Mobile Home Repair Program H-1.6
	Goal Description	Homeowner mobile home housing rehabilitation program. Consortium wide.
17	Goal Name	Utility Connection Program H-1.7
	Goal Description	Homeowner utility connection housing rehabilitation loan program. Consortium wide.
18	Goal Name	Housing Rehab - Lead Remediation Program H-1.9
	Goal Description	Homeowner lead remediation housing rehabilitation grant program. Consortium wide.
19	Goal Name	Affordable Housing - CHDO Projects H-2.1
	Goal Description	Construction of new affordable housing units with Community Housing Development Organizations (CHDO)'s as the project developer.
20	Goal Name	Homeless Needs - Rapid Re-Housing Program ESG-1.1
	Goal Description	Homeless assistance program for Rapid Re-Housing services.
21	Goal Name	Homeless Needs - Homeless Prevention Prgm ESG-1.2
	Goal Description	Homeless assistance program for Homeless Prevention services.
22	Goal Name	Homeless Needs - Data Collection ESG-1.3
	Goal Description	Homeless assistance program for Data Collection services.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following project information for FY 2026 provides a comprehensive overview on the ranges of CDBG, HOME and ESG activities.

#	Project Name
1	CDBG26- Program Administration
2	HOME26-Program Administration
3	HESG26- Rapid Re-Housing/Prevention/Data Collection/Admin
4	H26 - Fair Housing- Housing Opportunities Made Equal
5	H26- Fair Housing Support Services - Housing Counseling - Belmont Shelter Corp.
6	H26-CDBG/HOME Consortium Owner Occupied Housing Rehab Program
7	H26-CDBG/HOME West Seneca Housing Rehab Loan Program
8	H26-Hamburg - Homeowner Rehab
9	H26- Emergency Rehab Program
10	H26 - Rental Rehab Program
11	H26- Mobile Home Repair Program
12	H26 - Lead Abatement Program.
13	H26 - Utility Connection Program
14	H26- CHDO Projects.
15	ED26 - Micro Loan Program Program Income
16	CP26 - C.Lackawanna - Senior Center Improvements
17	CP26 - V. Gowanda - St. John's Park Improvement
18	CP26- V. East Aurora Hamlin Park Walkways
19	CP26- T. Elma Senior Center Improvements
20	CP26- Rural Transit Services
21	CP26- T.Newstead Furniture Replacement Akron/Newstead Center
22	CP26 - T. Holland Water Pump House Improvements
23	CP26- V.Springville - Waverly St. Waterline Replacement
24	CP26-C. Tonawanda - Sidewalk Replacement
25	CP26- T. West Seneca Senior Center Improvements
26	CP26- V. Alden - Street Improvement Project
27	CP26 - V.Depew - St. James Street Playground Improvements
28	CP26 -T.Evans - Waterfront Park Pavilion Restoration Project

Table 4 – Project Information

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

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population

of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG consortium.

There is one census tract in the consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate income populations within the consortium. There are a total of 64 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

2026 YEAR - CONSOLIDATED BUDGET SORTED

Project #	PROGRAMMED PROJECTS	HOME	CDBG-Admin	Emergency Solutions	Community Project	Economic Development	Project Support	Housing-CDBG	Future/Program Income	Prior Year Funds	Other Funds	Total
1	CDBG26- Program Administration		\$ 508,503.00									\$ 508,503.00
2	HOME26 - Program Administration	\$ 92,168.00										\$ 92,168.00
3	ESG26 - Program Administration			\$ 17,610.00								\$ 17,610.00
4	H26 - Fair Housing- Housing Opportunities Made Equal							\$ 42,720.00				\$ 42,720.00
5	H26 - Housing Support Services - Housing Counseling - Belmont Housing							\$ 26,716.00				\$ 26,716.00
6	H26 - CDBG Consortium Owner Occupied Housing Rehab Program							\$ 100,000.00	\$ 305,000.00			\$ 405,000.00
6	H26 - HOME Consortium Owner Occupied Housing Rehab Program	\$ 478,269.00							\$ 200,000.00			\$ 678,269.00
8	H26 - CDBG West Seneca Housing Rehab Loan Program							\$ 30,000.00	\$ 45,000.00			\$ 75,000.00
8	H26 - HOME- West Seneca Homeowner Rehab	\$ 98,939.00							\$ 25,000.00			\$ 123,939.00
9	HOME26 - Hamburg - Homeowner Rehab	\$ 114,058.00										\$ 114,058.00
10	H26 - Emergency Rehab Program							\$ 175,000.00				\$ 175,000.00
11	H26 - Rental Rehab Program							\$ 71,265.00				\$ 71,265.00
12	H26 - Mobile Home Repair Program							\$ 86,000.00				\$ 86,000.00
13	H26- Lead Abatement Program							\$ 73,000.00				\$ 73,000.00
14	H26- Utility Connection Program							\$ 50,000.00				\$ 50,000.00
15	HOME26 - CHDO Projects	\$ 138,252.00										\$ 138,252.00
16	ED26- ECIDA- Micro-Loan Program Program Income								\$ 112,000.00			\$ 112,000.00
17	CP26 - C. Lackawanna - Senior Center Improvements			\$ 150,000.00			\$ 4,000.00				\$ -	\$ 154,000.00
18	CP26 - V. Gowanda - St. John's Park Improvements			\$ 150,000.00			\$ 4,000.00				\$ 28,255.00	\$ 182,255.00
19	CP26 - V. East Aurora - Hamlin Park ADA Sidewalk Installation			\$ 103,505.00			\$ 3,000.00				\$ 10,661.00	\$ 117,166.00
20	CP26 - T. Elma - Senior Center Improvements			\$ 37,421.00			\$ 2,000.00				\$ -	\$ 39,421.00
21	CP26- Rural Transit Service			\$ 283,000.00			\$ 6,000.00				\$ 975,960.00	\$ 1,264,960.00
22	CP26- T. Newstead- Senior Center Improvements			\$ 9,500.00			\$ 1,000.00				\$ 500.00	\$ 11,000.00
23	CP26- T. Holland - Water Pump House Improvements			\$ 150,000.00			\$ 4,000.00				\$ 7,831.00	\$ 161,831.00
24	CP26 - V. Springville- Waverly Street Waterline Replacement			\$ 150,000.00			\$ 4,000.00				\$ 13,500.00	\$ 167,500.00
25	CP26 - C. Tonawanda - Sidewalk Replacement			\$ 150,000.00			\$ 4,000.00				\$ 51,925.00	\$ 205,925.00
26	CP26 - T- West Seneca- Senior Center Improvements			\$ 150,000.00			\$ 4,000.00				\$ 150,000.00	\$ 304,000.00
27	CP26- V. Alden- Road Paving Improvements			\$ 150,000.00			\$ 4,000.00				\$ 125,268.00	\$ 279,268.00
28	CP26- V. Depew- St. James Place Playground Improvements			\$ 150,000.00			\$ 4,000.00				\$ 50,324.00	\$ 204,324.00
29	CP26- T. Evans- Waterfront Park Pavilion Restoration			\$ 150,000.00			\$ 4,000.00				\$ 150,000.00	\$ 304,000.00
30	CP26- T. Brant- Brant Town Hall Playground Improvements									\$ 100,000.00	\$ 50,000.00	\$ 150,000.00
3	ESG26- Rapid Re-Housing Rental Assistance			\$ 103,601.00							\$ 55,085.00	\$ 158,686.00
3	ESG26- Homeless Prevention Rental Assistance			\$ 103,601.00							\$ 55,085.00	\$ 158,686.00
3	ESG26- HMIS Data Collection			\$ 10,000.00							\$ 10,000.00	\$ 20,000.00
	TOTAL	\$ 921,686.00	\$ 508,503.00	\$ 234,812.00	\$ 1,783,426.00	\$ -	\$ 48,000.00	\$ 654,701.00	\$ 687,000.00	\$ 100,000.00	\$ 1,734,394.00	\$ 6,672,522.00
				\$ 2,994,630.00								

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG26- Program Administration
	Target Area	
	Goals Supported	Administration CD-5.1
	Needs Addressed	Planning/Administration
	Funding	CDBG: \$508,503.00
	Description	Administration funds for CDBG grant
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	HOME26-Program Administration
	Target Area	
	Goals Supported	Administration CD-5.1
	Needs Addressed	Planning/Administration
	Funding	HOME: \$92,168.00
	Description	Administrative funds for HOME grant.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	HESG26- Rapid Re-Housing/Prevention/Data Collection/Admin
	Target Area	
	Goals Supported	Administration CD-5.1 Homeless Needs - Rapid Re-Housing Program ESG-1.1 Homeless Needs - Homeless Prevention Prgm ESG-1.2 Homeless Needs - Data Collection ESG-1.3

	Needs Addressed	Homeless Assistance
	Funding	ESG: \$234,812.00
	Description	HESG Services for Rapid Re-Housing/Prevention/Data Collection/Admin.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	HESG Services for Rapid Re-Housing/Prevention/Data Collection/Admin
	Planned Activities	
4	Project Name	H26 - Fair Housing- Housing Opportunities Made Equal
	Target Area	
	Goals Supported	Fair Housing Services CD 3.2
	Needs Addressed	Public Services
	Funding	CDBG: \$42,720.00
	Description	Fair Housing Services
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	H26- Fair Housing Support Services - Housing Counseling - Belmont Shelter Corp.
	Target Area	
	Goals Supported	Fair Housing Services CD 3.2
	Needs Addressed	Public Services
	Funding	CDBG: \$26,716.00
	Description	Fair Housing Services
	Target Date	3/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	H26-CDBG/HOME Consortium Owner Occupied Housing Rehab Program
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Program H-1.1
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$405,000.00 HOME: \$678,269.00
	Description	Housing Rehab Program - consortium wide - CDBG and HOME funds.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	H26-CDBG/HOME West Seneca Housing Rehab Loan Program
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Prgm T. West Seneca H-1.2
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$75,000.00 HOME: \$123,939.00
	Description	Housing Rehab Program in the Town of West Seneca. CDBG and HOME funds.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	
8	Project Name	H26-Hamburg - Homeowner Rehab
	Target Area	
	Goals Supported	Owner Occ. Deferred Loan Prgm T. Hamburg H-1.3
	Needs Addressed	Housing Rehabilitation
	Funding	HOME: \$114,058.00
	Description	Housing rehab program in the Town of Hamburg.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	H26- Emergency Rehab Program
	Target Area	
	Goals Supported	Emergency Repair Program H-1.4
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$175,000.00
	Description	Emergency repair housing rehab program
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
10	Project Name	H26 - Rental Rehab Program
	Target Area	
	Goals Supported	Rental Rehabilitation Program H-1.5
	Needs Addressed	Housing Rehabilitation

	Funding	CDBG: \$71,265.00
	Description	Rental rehab housing program
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
11	Project Name	H26- Mobile Home Repair Program
	Target Area	
	Goals Supported	Mobile Home Repair Program H-1.6
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$86,000.00
	Description	Mobile Home repair program.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
12	Project Name	H26 - Lead Abatement Program.
	Target Area	
	Goals Supported	Housing Rehab - Lead Remediation Program H-1.9
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$73,000.00
	Description	Housing rehab lead remediation
	Target Date	3/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
13	Project Name	H26 - Utility Connection Program
	Target Area	
	Goals Supported	Utility Connection Program H-1.7
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$50,000.00
	Description	Housing Utility Connection Program
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	H26- CHDO Projects.
	Target Area	
	Goals Supported	Affordable Housing - CHDO Projects H-2.1
	Needs Addressed	Affordable Housing
	Funding	HOME: \$138,252.00
	Description	Construction of affordable housing.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

15	Project Name	ED26 - Micro Loan Program Program Income
	Target Area	
	Goals Supported	Micro-Loan Program ED-4.1
	Needs Addressed	Business Development
	Funding	CDBG: \$112,000.00
	Description	50/50 matching grant-loan program for small businesses where the owner resides in a low to moderate income household.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
16	Project Name	CP26 - C.Lackawanna - Senior Center Improvements
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$154,000.00
	Description	6 ADA power assist devices and associated wiring for restrooms; 2 entry doors into Community room; installation of universal lever style door handles; replace interior lighting with LED lighting; paint approximately 33,900 sq ft of interior walls.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	765 low-to-moderate income seniors to be assisted
	Location Description	Lackawanna Senior Center, 230 Martin Road
	Planned Activities	Senior Center Improvements
17	Project Name	CP26 - V. Gowanda - St. John's Park Improvement
	Target Area	
	Goals Supported	Parks/Open Space Facility Improvements CD-2.2

	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Re-surface existing deteriorated basketball court with asphalt surface to be lined and striped, purchase new steel hoops. Restore Splash pad and install new spray features
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	815 low-moderate income residents will be assisted
	Location Description	St. John's Park
	Planned Activities	St. John's Park Improvement
18	Project Name	CP26- V. East Aurora Hamlin Park Walkways
	Target Area	
	Goals Supported	Public Building and ADA Improvements CD-2.1
	Needs Addressed	Public Facilities
	Funding	CDBG: \$106,505.00
	Description	Add four inch thick, five ft wide, 420 ft long concrete sidewalk along the parking lot of Hamlin Park.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	1032 low-to-moderate income seniors and handicapped residents will be assisted
	Location Description	V. East Aurora Hamlin Park
	Planned Activities	V. East Aurora Hamlin Park Walkways
19	Project Name	CP26- T. Elma Senior Center Improvements
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$39,421.00
	Description	Two ADA compliant front doors and purchase of large screen TV

	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	108 low-to-moderate income seniors to be assisted
	Location Description	Town of Elma Senior Center, 3007 Bowen Road
	Planned Activities	T. Elma Senior Center Improvements
20	Project Name	CP26- Rural Transit Services
	Target Area	
	Goals Supported	Transportation CD 3.1
	Needs Addressed	Public Services
	Funding	CDBG: \$289,000.00
	Description	Funding for transportation services for the low income and elderly population of 25 municipalities including the Towns of Aurora, Akron, Angola, Brant, Boston, Clarence, Colden, Collins, Concord, East Aurora, Eden, Elma, Evans, Farnham, Gowanda, Holland, Marilla, Newstead, North Collins, Orchard Park, Sardinia, Springville and Wales.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	1,651 elderly and handicapped persons to be assisted.
	Location Description	
	Planned Activities	Transportation services for low income residents and senior citizens in 25 municipalities.
21	Project Name	CP26- T.Newstead Furniture Replacement Akron/Newstead Center
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$10,500.00
	Description	(8) 60 round banquet tables; 56 upholstered, stackable high-back chairs; Furniture transport carts and storage dollies
	Target Date	3/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	761 low-to-moderate income seniors to be assisted
	Location Description	Akron/Newstead Senior Center, 5691 Cummings Road, Akron
	Planned Activities	Furniture Replacement Akron/Newstead Senior Center
22	Project Name	CP26 - T. Holland Water Pump House Improvements
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Replace old Motor Control Center (MCC) with a new Pump House Control Panel (PHCP).
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	462 low-to-moderate income residents to be assisted
	Location Description	T. Holland Water District Pumphouse #1
	Planned Activities	T. Holland Water Pump House Improvements
23	Project Name	CP26- V.Springville - Waverly St. Waterline Replacement
	Target Area	
	Goals Supported	Water/Sewer/Drainage Improvements CD-1.1
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Replacing 6" cast iron watermain on Waverly St and crossing to Pinewood Ave and Ohio St with 8" ductile iron pipe. Length of project is 3,800 linear feet of pipe along with seven fire hydrants, twelve 8 in. valves and twenty-four service connections.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	905 low-to-moderate income seniors to be assisted
	Location Description	Waverly Street, Village of Springville
	Planned Activities	Waverly Street Waterline Replacement
24	Project Name	CP26-C. Tonawanda - Sidewalk Replacement
	Target Area	
	Goals Supported	Sidewalk Improvements CD-1.2
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Replacement of a total of 375 blocks of 4-inch-thick sidewalks and 58 blocks of 6-inch-thick sidewalks at driveways in various locations.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	4,510 low-to-moderate income persons
	Location Description	Various locations through the low/moderate income block groups in the City of Tonawanda
	Planned Activities	2026 Sidewalk Replacement
25	Project Name	CP26- T. West Seneca Senior Center Improvements
	Target Area	
	Goals Supported	Senior Center Improvements CD-2.3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$154,000.00
	Description	New flooring, concrete sidewalk replacement, automatic front door replacement, new Senior Center Van, HVAC upgrades, ceiling tile replacement
	Target Date	3/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	3,537 seniors to be assisted
	Location Description	West Seneca Senior Center, 4620 Seneca Street
	Planned Activities	Senior Center Improvements
26	Project Name	CP26- V. Alden - Street Improvement Project
	Target Area	
	Goals Supported	Road Improvements CD-1.3
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Kellog St: Approx 1180 linear feet of pavement & sidewalk; Slade Dr. Approx 420 linear feet of pavement; Rusher Dr: Approx 420 linear feet of pavement; South Westcott: Approx 576 linear feet of pavement.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	495 low-moderate income residents will be assisted
	Location Description	Kellogg Street, Slade Drive, South Westcott Ave
	Planned Activities	Street Improvement Project
27	Project Name	CP26 - V.Depew - St. James Street Playground Improvements
	Target Area	
	Goals Supported	Parks/Open Space Facility Improvements CD-2.2
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Remove and replace existing playground equipment with 2 new slides, new climbers, ladders, sensory panels. Removal of existing chain link fence along driveway and installation of 125-foot run of four-foot-high chain link fencing. New 6 foot by 6-foot concrete ramp at opening of fence.
	Target Date	3/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	580 low-to-moderate income persons
	Location Description	St. James Playground, 90 St. James Street
	Planned Activities	V. Depew – St. James Street Playground Improvements
28	Project Name	CP26 -T.Evans - Waterfront Park Pavilion Restoration Project
	Target Area	
	Goals Supported	Parks/Open Space Facility Improvements CD-2.2
	Needs Addressed	Infrastructure (Community Development)
	Funding	CDBG: \$154,000.00
	Description	Reinforcing the existing slab foundation, replacing or restoring all structural framing, new roof including underlayment and painting.
	Target Date	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	1,565 low-to-moderate income persons
	Location Description	Evans Town Park
	Planned Activities	T. Evans – Waterfront Park Pavilion Restoration Project

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

Reference should be made to Maps 3, 4, 5 and 6 that are located in ES-05 "Executive Summary" section of the Action Plan in the introduction. These describe the geographic areas within Erie County in which assistance will be directed in 2026. The titles are noted below:

- a) Map 3: CDBG Neighborhood Target Areas within Erie County
- b) Map 4: CDBG Eligible Block Groups
- c) Map 5: CDBG Census Tracts with Substantial Minority Population
- d) Map 6: CDBG Census Tracts with Substantial Low Income Population

It is estimated that 33% of all HOME and CDBG funds will be directed toward the target areas in 2026. This includes 27% of housing rehab monies as well as one economic development project.

Geographic Distribution

Target Area	Percentage of Funds
City of Lackawanna - First Ward Target Area	14
Village of Depew- Main Street/Terrace Blvd. Target Area	8

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The service area for the Erie County/CDBG Consortium includes a total of 34 municipalities (population of approximately 312,000) which includes all of Erie County with the exception of the City of Buffalo and Towns of Amherst, Cheektowaga, Tonawanda and Hamburg for the CDBG program. Hamburg, with a total population of approximately 56,000, is a member of the HOME consortium not the CDBG Consortium.

There is one census tract in the Consortium that has a high minority population. It is located in the first ward neighborhood of the City of Lackawanna. The City of Lackawanna along with the City of Tonawanda also have the highest low-to moderate-income populations within the Consortium. There are a total of 55 income eligible block groups in the Consortium. There are eleven communities that do not contain any census eligible areas. Priority for funding projects is given to those low-income concentrated areas.

Neighborhoods included for housing rehabilitation priority in the Action Plan are the City of Lackawanna First Ward, Town of Evans – Lake Erie Beach, Village of Depew – Main Street/Terrace Boulevard area, City of Tonawanda- northeast and the Town of West Seneca- City of Buffalo border. Funding limitations hinder the ability to fund more community development and economic development projects. The housing program has the obstacle of such a large geographic area served, which makes targeting funds and showing major progress in a specific area difficult. This was the reason for increased housing rehabilitation targeting of funds in the noted areas.

Discussion

Affordable Housing

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

Introduction

HOME ARP FUNDS. The Consortium will use HOME funds, ESG funds and a portion of CDBG funds for affordable housing. The HOME and CDBG funds will be used to rehabilitate existing housing units and the ESG funds will be allocated to rental assistance for the homeless and households at risk of homelessness. Low Income Housing Tax Credits will be used for rental housing, both new and rehab of existing units. The special-needs population will be served through the rehabilitation of existing structures for rental housing. Rental assistance will also be available through HUD Section 8 Vouchers which are administered by Belmont Housing Resources of Western New York. It is anticipated that there will be an increase in rental assistance through the ESG grant due to pandemic eviction moratoriums ending at the end of PY 2021.

One Year Goals for the Number of Households to be Supported	
Homeless	39
Non-Homeless	9
Special-Needs	3
Total	51

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	11
The Production of New Units	2
Rehab of Existing Units	85
Acquisition of Existing Units	0
Total	98

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Note that the “rental assistance” figure above reflects the annual goal for homeless persons participating in the Rapid Rehousing Prevention and Stabilization Program.

There is a great need for affordable housing in the Consortium communities. The following financial assistance will be available to low-income households in the Consortium:

- Zero interest deferred loans to homeowners to rehabilitate their homes.
- \$5,000 grant to mobile owners to rehabilitate their mobile home.
- Grants to individuals with a disability that need alterations to their structures to make it accessible.

Financial assistance to landlords to rehabilitate rental property for low-income households

The production of new units will include two new single-family homes constructed in the City of Lackawanna for low-income families with the use of HOME CHDO funds.

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

Introduction

There are two public housing authorities within the Erie County Consortium; the Lackawanna Municipal Housing Authority (LMHA) and the Tonawanda Housing Authority (THA). The LMHA operates three federally-funded housing developments in the City of Lackawanna. The developments have a total of 490 units: 396 for families and 94 for senior citizens. There is a total of 264 units within the THA; 211 for families and 42 for senior citizens. It is important to note that the THA is state-funded rather than federally funded.

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

The Lackawanna Municipal Housing Authority (LMHA) has two Educational Resource Centers and a Wellness Center on site. Various programs are offered including Cub Scouts, Girl Scouts, children's holiday parties and educational classes.

In an effort to improve the safety of the Baker Homes, Glover Gardens, and Parkview Towers the LMHA continues to use cameras across from both developments, providing increased security for the residents.

LMHA continues to try and work with different organizations to provide service to our residents. Throughout the summer months the LMHA partners with various clubs including the LA Sports Club, LA Bengals, Independent Health, amongst others to provide various softball, basketball, football, and soccer leagues for children and adults in the community. The Housing Authority is also in discussions to provide various learning, awareness, and prevention classes over the course of the summer for members of the community.

1. LMHA continues to address the physical needs of its properties with many updates over recent years. LMHA has replaced the roofs at its Glover Gardens complex. The LMHA also continues to paint, install new flooring, update kitchens and update bathrooms in apartments as needed throughout the year.
2. The LMHA finished installing a new ADA compliant playground and splash pad over the past summer.

THA implemented subsidized housing via a NYS award of 104 Project Based Vouchers. THA has remained unsubsidized since it opened in 1942. THA has begun a property rehab that will include a brand-new Senior Living Building (54 units) as the first phase of our project. Phase 2 is to rehabilitate all apartments on the property over the next 3-5 years. After the existing Senior Housing Buildings are demolished. In 2025 THA began the redevelopment of the 3 NYS Projects by breaking ground on the new Senior Living building called Hillview Commons, THA expects to occupy that building by mid-2027 with added capacity for Seniors.

THA expects to begin Phase 2 of redevelopment by rehabbing all Family Living units and making units ADA compliant. THA continues our redevelopment process with the support of State, County and City Government and with an overall completion plan for mid-2029.

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

Within the Lackawanna Municipal Housing Authority (LMHA), the interests of tenants in management are met through three current tenant members who sit on the Authority Board. The Lackawanna Municipal Housing Authority has 3 tenant council boards for each development.

THA has very active Tenant Representatives who schedule community events throughout the year and help publish Seasonal Newsletters. . Board Meetings are held in person and with a virtual link. THA utilizes mailbox flyers for all THA initiatives in an attempt to get our messages out to all. Since 2022, THA also utilizes “text alert” cell phone notifications to all tenants who have subscribed when there are urgent issues on property such as power or water outages, construction on property, grass cutting and snowplow operations.

Installation of two Food Pantry / Little libraries continue to be managed by the tenants in cooperation with the City of Tonawanda School District. They have a class of kids that 1-2 per week come and stock the pantry with food they have collected. Continue to hold events like Easter Egg Hunt, Fire Safety Day where the fire department brings a fire truck to the property and we do a bicycle registration in conjunction with the Police department. Our website updated website (2026) will include more tenant facing support modules such as online rent payment, application process and social support organization links as well as links to the School District and City Hall for services needed by residents. Community outreach continues as we have City of Tonawanda officials attending the THA Board Meetings and make themselves available to solve problems and answer questions. In 2026 THA will also be adding a “Tenant Focused” role to better serve our Tenants and help solve issues and concerns of the Tenants.

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

THA continues to address its fiscal viability by implementing PBV's and Section 8 vouchers for the first time in its history. This change has significantly improved our ability to maintain the property. Also, as we move into Tax Credit funding programs for construction, this change is vital to the investment community for support to our project conversion. THA's most recent Audit it was noted that THA has achieved its fiscal Budget and continued to increase its Reserves and added Operating Revenue. THA will continue to use NYS Grant Money to prepare for reconstruction by ensuring all apartments are in excellent shape prior to rehab in 2026 / 2027.

Discussion

LMHA currently has a waitlist of approximately 300 people, with an overall occupancy rate of 97%.

THA currently has a waitlist of about 70 applicants. THA has closed our application process to build vacancy to accommodate tenant movement during the rehab project scheduled for late 2026. THA has also re-written its Fiscal Manual, Employee Manual and Tenant Manual to reflect current standing and future changes due to redevelopment to include newly created positions for managing the new THA.

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

Introduction

The County, through its Department of Social Services, provides services to individuals and families that are homeless or at risk of becoming homeless. Social Welfare Examiners and Caseworkers in the Homeless Unit are dedicated to assisting homeless persons with determining eligibility and securing permanent housing as part of the Department's emergency services. The caseworkers assess the individual or family's needs and develop an independent living plan that includes housing and other supportive housing services required by homeless individuals and families to live independently, within the guidelines and requirements of NYS Regulation and Law.

The Department of Environment and Planning provides housing relocation and stabilization services to individuals and families that are homeless or at-risk of becoming homeless. Case managers provide individualized services to facilitate housing stability for program participants who are seeking permanent housing or at-risk of losing permanent housing.

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

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

The District is funded to provide Family Centered Services to families experiencing homelessness in an effort to obtain and maintain permanent housing. The team was complete as of August 2025 and currently has 126 active households engaged. The focus is on families sheltered in area motels. In the next year, the team will focus on partner engagement, training and case conferencing to increase positive results.

Additionally, the District will receive 78 Housing Access Vouchers in March of 2026 from the Office of Temporary and Disability Assistance. These vouchers will assist 78 families or individuals in finding affordable housing.

The Department of Social Services is working with current and potential shelter providers to increase the availability of shelters and improve the services provided. 2026 will be the fourth year of the required OTDA shelter certifications. The certification requirement has shed light on new and old shelter concerns. Learning from 2023, 2024, and 2025 DSS will continue to adjust service provision and staffing to best support our clients. The District has implemented performance measure and monitoring for 2026, and will move toward goal setting in 2027.

DSS will continue to offer the Rental Supplement Program to eligible homeless and at-risk of homelessness clients. The program, while limited to clients receiving services will help a total of about

270 households obtain or maintain permanent housing.

CoC homeless outreach teams search for unsheltered persons in Erie County and provide access to services. Erie County provides funding for Code Blue, the Erie County emergency weather safety plan.

Code Blue provides shelter, food, and other resources. Code Blue staff utilize a van to travel throughout the community looking for people who are on the street or staying in places not meant for human habitation to relocate to code blue shelters.

Erie County Department of Social Services will continue to support programs that help homeless persons, especially unsheltered persons and including the chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth. The programs include the Emergency Assistance to Adults, Emergency Assistance to Needy Families with Children and Emergency Safety Net Assistance. The programs provide financial assistance for shelter arrears, security agreements, water shutoff restore, heating equipment repair and replacement, home repairs, moving expenses and storage cost for furniture and personal belongings. These services will help homeless persons make the transition to permanent housing and independent living.

The Erie County Department of Mental Health contracts with Endeavor Health Services and Best Self to fund outreach teams that can do street, hospital and shelter outreach for the homeless population which helps them get referred to housing. The teams are also able to provide temporary diagnosis information in order to help clients get the correct level of care in which they need.

Addressing the emergency shelter and transitional housing needs of homeless persons

To address the needs of homeless persons needing emergency shelter and transitional housing the County will continue to provide emergency shelter that serve homeless persons in Erie County. The Erie County Department of Social Services will continue to assist clients through organizations that operate emergency shelters and transitional housing through shelter allowances for the homeless clients. The Department of Social Services contracts with 211 of WNY so individuals seeking emergency shelter have 24-hour access to services. As a result, there are no unsheltered families in Erie County. Emergency Shelters and Transitional Housing programs are using Coordinated Assessment system that the CoC developed to prioritize clients who are most in need and ensure clients are referred to the right program with the right level of care.

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

The County will continue to use federal funds received under the Emergency Solutions Grant Program for a Rapid Re-housing and Homelessness Prevention Program. The Program prevents individuals and families at risk of becoming homeless from becoming homeless and shortens the shelter stay for homeless individuals and families. The Program provides relocation and stabilization services to individuals and families that are homeless or at risk of becoming homeless. These services help homeless individuals and families make the transition from living in a shelter to permanent affordable housing. In order to stabilize program participants and prevent program participants from becoming homeless again, program participants are required to work with a case worker while receiving program services.

The Erie County Department of Mental Health prioritizes individuals that are chronically homeless and have a mental health disability for their permanent supportive housing beds. Both the ECDMH and Environment and Planning are using the Coordinated Assessment system that the CoC developed to prioritize clients who are most in need. Once a client is referred to a housing slot bed, they are able to work on goals that help them both assimilate to and achieve the transition from homelessness to more permanent housing lifestyle.

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

The County works with publicly funded institutions and systems of care such as healthcare facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions to ensure that low-income, especially extremely low-income individuals and families being discharged have housing and services required to avoid homelessness. If discharge services, including housing, are not provided by the publicly funded institutions, the Department of Social Services provides Rental Assistance in the form of Security Agreements and Back Rent payments, to eligible households using County funding. Additionally, DSS has received \$3.1 million in Shelter Arrears and Eviction Prevention funds from NYS for 2025-2026. These funds will assist residents in paying up to 6 months of arrears and preventing eviction. If DSS is not able to assist, the Department of Environment & Planning provides housing relocation, stabilization services and rental assistance to eligible individuals and families in order to prevent the individuals or families from becoming homeless.

The County relies upon Project Blue, an initiative partnering with community providers to reduce Erie County Holding Center recidivism through housing assistance, pre-and post-release support, peer mentoring, cognitive behavioral therapy, and off-site substance abuse and mental health treatment, job training, and education. Service Link Stop is a program through the County's Mental Health Department that provides a central referral location for connecting people leaving Erie County Holding Center with

housing services, mental health services, and other wrap-around services. Currently Project Blue and the Service Link Stop remain active programs and are supported in part by Erie County.

Discussion

The Erie County Department of Mental Health Adult Single Point of Access (SPOA) for Housing has continued to coordinate services with various housing service providers in Western New York. This collaboration facilitates the placement of high need individuals into over 1800 slots of different tiers of mental health residential services including supervised community residences, treatment apartments, single room occupancy facilities, and permanent supportive housing. The Adult SPOA for Housing received 2,231 referrals for housing in 2025, an increase from 2226 in 2024. This reflects the very high demand for such services in the community.

In order to serve high utilizers of hospital services, the Erie County Department of Mental Health collaborates with the Buffalo Psychiatric Center, Erie County Medical Center, and BryLin to facilitate discharges and system flow. This includes:

- weekly planning and case conferencing with the Buffalo Psychiatric Center and residential providers of every pending discharge to housing in order to help place individuals in the correct level of care and with successful treatment plans.
- Monthly case conferencing with ECMC CPEP to discern how to best serve high utilizers of CPEP
- Bimonthly meetings with care coordination providers in the community to discuss complicated cases
- Ad-hoc technical assistance when requested

The County has created specific resources to facilitate mental health system movement. This includes a set-aside supportive program for people who have been at the Buffalo Psychiatric Center for more than six months (65 beds operated by Spectrum Human Services), as well as 58 additional beds for those leaving BPC residences or for whom leaving a different residential setting would open a spot for someone from BPC (27 beds operated by Spectrum Human Services, 31 by Living Opportunities of DePaul). The County also coordinates services with a New York State Office of Mental Health housing project meant to facilitate the housing of people discharged from ECMC CPEP to facilitate their recovery (19 beds with Spectrum Human Services).

SPOA collaborates with the Continuum of Care Coordinated Entry process to facilitate housing placements of the highest need clients into ECDMH's HUD-funded housing (527 beds) and into other housing, including Empire State Supportive Housing Initiative beds for those with serious mental illness. The SPOA participates in the Continuum of Care's Veteran By-Name list meeting as it has a 40-bed program included in the HUD-funded programs that typically serves higher than capacity.

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

Introduction

The County continues to address barriers of providing affordable housing for low and very low-income households in the Consortium communities. An Analysis of Impediments to Fair Housing Choice study was completed in February of 2025. Barriers identified in the study include making housing affordable, public policies, limited resources and access.

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

The Erie County Consortium through the Erie County Department of Environment and Planning will continue to affirmatively further fair housing. In 2025, the County sent out mailings and informational materials about the local Fair Housing Law to local leaders and housing providers as part of the County's continued education and marketing to affirmatively further fair housing. Erie County will incorporate barriers noted in the recent (AI) to Fair Housing report and work with Consortium Municipalities in addressing those barriers and work towards limiting them.

With the goal of strengthening fair housing enforcement activities throughout Erie County, the County will continue to serve on the Erie County Fair Housing Partnership board. In collaboration with the Partnership, Erie County adopted a local fair housing law in 2018.

Erie County DEP will continue to implement its Payment in Lieu of Taxes (PILOT) policy for affordable housing development by reviewing PILOT applications and assisting with the application approval process. PILOT agreements make affordable housing development and management feasible by allowing for a reduced payment, in lieu of paying the full taxes, when the units will be occupied by low and very low-income tenants and will remain affordable throughout the terms of the PILOT agreement.

Discussion

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

Introduction

Contingency Provision – It should be noted that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities indicated below.

a) CDBG Program

(1) Increase:

- Twenty percent of any increase will be applied to planning and administration.
- The balance will be applied to the Unprogrammed community projects listed in the order shown below:

- 1) T. Brant/V. Farnham- \$100,000- Playground Improvements
- 2) V. Lancaster– \$150,000- West Drullard Playground Improvements
- 3) T. Lancaster- \$74,684– Keysa Park Pool Improvements
- 4) T. Concord- \$150,000- Town Park ADA Restroom Improvements
- 5) V. Franham- \$150,000- Senior Center Improvements

(2) Decrease:

- Twenty percent of any decrease will be applied to the planning and administration project.

The balance of any decrease will be applied to the CD Consortium Housing Rehab Program

- Targeted, Developing, Rural.

b) HOME Investment Partnership

(1) Increase:

- Ten percent of any increase will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.

- The balance will be applied to the HOME Housing Rehab Consortium project.

(2) Decrease:

- Ten percent will be applied to the HOME Administration project.
- Fifteen percent will be applied to the Community Housing Development Opportunity set aside.
- The balance will be applied to the HOME Housing Rehab Consortium project.

c) Emergency Solutions Grant Program (ESG)

(1) Increase:

- 7.5 percent will be applied to the ESG Administration project.
- The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the increase for each reflecting the same percentage of the overall ESG allocation.

(2) Decrease:

- 7.5 percent will be applied to the ESG Administration project.

The balance will be applied to each remaining ESG project listed in section AP-35 of the Erie County Action Plan, with the decrease for each reflecting the same percentage of the overall ESG allocation.

Actions planned to address obstacles to meeting underserved needs

The 5 year strategic plan clearly notes the need for additional rental housing for low and moderate income households within the Consortium. New in 2021 was the "Live Well Erie" document which is a health and human services action plan for Erie County government based on the idea that it is unacceptable for a newly revitalized Western New York to leave behind significant portions of our community when we can effect positive change in their lives.

1. As such, the plan outlines specific measures that Erie County government will undertake to improve the quality of life for residents in need. In 2025 "Live Well Erie" initiatives were implemented that included the creation of new units of affordable housing.
2. An "Analysis of Impediments to Fair Housing Choice" study was completed in February of 2025. The study serves as the basis for fair housing planning in Erie County.

Actions planned to foster and maintain affordable housing

1. The Erie County Housing Policy and Procedures Manual was updated in the 2024 program year. Key changes will include adjusting the maximum home value amounts for CDBG and HOME housing rehab cases. Updated numbers from HUD for the Erie County SMA area will be utilized.

Actions planned to reduce lead-based paint hazards

NYS Lead Based Paint Prevention Program – “Childhood Lead Poisoning Prevention Program”

This is a core program funded by the State for identification and mitigation of lead hazards associated with elevated blood lead levels and primary prevention activities to assist families with young children to avoid exposure to lead hazards. This is the second year of a 5-year contract which is funded annually for \$1.1 million per year.

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

This involves home environmental inspections, case management with a nurse, and follow-up referral to primary care physicians.

The program also collaborates with local Section 8 Housing providers and other community partners to make proactive inspections and assist property owners in maintaining safe units. The program provides lead safe work practices classes and paint kits to participating owners.

Erie County Window Replacement Program

Erie County received an award of \$350,000 from the New York State Attorney General's Office for a Window Replacement Program to address energy efficiency and potential lead hazards. The program is available County-wide for homeowners and also for rental properties. Occupants of treated units must be low income. Homeowners may have a required contribution depending on income. Program began in 2024.

LEADSAGE Erie County Lead Hazard Reduction Program

This program is funded through HUD. The current grant of \$7 million continues through 2028. LeadSAFE's primary goal is to prevent lead poisoning via improvements to owner-occupied and rental housing. Homeowners must contribute towards the cost of mitigating lead-based paint hazards.

Although they may have to pay up to a maximum of 12% to the total hazard control cost, in most instances the cost is \$150-\$250. On average, about 75 units per year are assisted under this program. Although the program is available County-wide, about 75-80% of the grants are made to homeowners within high-risk ZIP code areas. Homeowners and/or tenants must have an income which is below 80% of area median income and have at least one child under age 6 living in the unit.

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

Leading in Lead Prevention Pilot Program

The Erie County Health Department anticipates an award of grant funds in 2024 from NYS Housing Trust Fund Corporation to implement this pilot program. Similar in scope to the HUD Lead Hazard Grant, this program will focus strictly on multiple dwelling (2+ units) rental properties built before 1980 in identified communities of concern. The goal is to target 125 units over two years per, a maximum not exceeding the amount of \$35,000 per unit.

“NEW” – NYS Lead Rental Registry and Proactive Inspections

The Lead Rental Registry Program addresses rental units built before 1980 in Erie County Communities of Concern, Zip Codes 14201, 14204, 14206, 14207, 14208, 14210, 14211, 14212, 14213, 14214, 14215 and 14225.

Requirements

- Pre-1980 housing with two or more units must be registered in Lead Rental Registry data systems, regardless of if units are owner-/family-occupied.
- Rental units must be inspected. documented as free of lead hazards before they can be issued a lead safety certification.
- Property owners and landlords must oversee prompt cleanup and lead safe repairs when hazards are identified. Compliance will be tracked, monitored, and enforced.

Actions planned to reduce the number of poverty-level families

As identified in the Initiatives for a Stronger Community and Live Well Erie plans, Erie County will increase financial security and reduce poverty by supporting access to affordable housing. The following

actions are being employed to reduce the number of poverty-level families in Erie County:

LEAD REMEDIATION HOUSING REHAB PROGRAM: This program was funded in the 2024 PY with 7 cases being completed. The program will continue to be funded in the 2025 PY.

AFFORDABLE RENTAL HOUSING INCENTIVE PROGRAM: Approximately \$181,100 in HOME funds will be set aside in 2025. These dollars serve as a source of local matching money and help to leverage millions more. Nonprofit developers will use this money when applying for state and federal affordable housing dollars, making their projects more competitive. Priority will be given to family rental housing.

ERIE COUNTY FAIR HOUSING LAW: In 2018 the ECDEP and Department of Law completed a new Countywide Fair Housing Law. The law was passed in May of 2018 and ECDEP is administering the implementation of the law. Housing discrimination due to many factors ranging from lawful source of income to family type are important components of the law. Access to fair housing opportunities is a critical need for families struggling to eliminate all constraints to their financial security.

Actions planned to develop institutional structure

1. The 2026 Program Year will mark the third year of a new 3 year cycle wherein all 37 members of the HOME Consortium have an approved three year renewable agreement with Erie County.
2. The continued reasonableness of the existing percentage allocation formula for distribution of CDBG funds among housing, community revitalization, and economic development will be reviewed as the 2025 program year progresses.
3. In August of 2023 a new 3 year cycle was approved by HUD.
4. In the 2026 Program Year Erie County will re-certify all 34 municipal members of the Consortium for another 3 year period.

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

Erie County will expand the current CDBG Coordinating Committee to insure better representation by social service agencies. An evaluation of the Housing Working Group formed as part of the One Region Forward initiative will occur. This membership roster will provide a

1. useful resource for additional representation on the coordinating committee from public and private housing groups.
2. Erie County is preparing a comprehensive blueprint for carrying out human service programs. The CDBG grant and resources available through it will be incorporated into the document. This will aid in ongoing coordination between CDBG and DSS activities.

Discussion

Program Specific Requirements

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

Introduction

The CDBG Program will continue to generally utilize the fund distribution policy established by the Consortium in prior years (i.e. 27% Community Revitalization, 27% Housing, and 27% Economic Development). HOME Funds will be used for Homeowner Rehab, new construction of affordable housing and very minimal Homebuyer programs. Emergency Shelter activities will remain focused on rapid rehousing and homeless prevention efforts.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
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.	0.00%

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

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

Erie County will use HOME funds as specified in section 92.205. This primarily includes grants, and non-interest bearing loans. No other forms of HOME investment will be utilized in 2026 Program Year.

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

See attached HOME Recapture Guidelines below (attached).

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

Reference should be made to the HOME fund recapture policy noted in the response to AP90(2) above.

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

HOME funds will not be used to refinance existing loans, thus this Section is not applicable to the Erie County Action Plan.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Emergency Solutions Grant (ESG)

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Buffalo, Niagara Falls, Niagara and Erie County CoC developed and launched a Coordinated Assessment System in 2015, now the Buffalo/Niagara Falls, Erie, Niagara, Genesee, Orleans and Wyoming CoC. All HUD funded agencies, including CoC and ESG, are using the assessment system. Clients can access Coordinated Entry through coordinated entry hubs, shelters, street outreach teams or community partners, e.g. hospital discharge planner.

The system uses a set of coordinated entry assessment tools (Vulnerability Index and Service

Prioritization Decision Assistance Tool developed by OrdCode) across the entire CoC to triage clients and prioritized those who are most in need. The Homeless Management Information System (HMIS) is used by the CoC to manage coordinated entry priority list.

The coordinated assessment tool is used to determine a potential program participant's eligibility for assistance for Rapid Re-housing (RRH) or Homelessness Prevention (HP). The coordinated assessment tool is available in HMIS, and all ESG program staff has been trained in HMIS and using the coordinated assessment tool or taking referrals through HMIS.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The County allocates ESG funds it receives from HUD through a Request for Proposal (RFP) process. Erie County issued an RFP in August, 2017 for HMIS services and Housing Relocation and Stabilization Services. The ESG RFP was advertised in the legal notices section of a local newspaper and a minority-owned newspaper. Not for profit organizations that provide services to persons that are homeless or at risk of becoming homeless were notified. The RFP included the ESG Program's requirements and an Erie County ESG Proposal Guide. Agencies interested in receiving ESG funds from the County's allocation were invited to an informational meeting that explained the Program requirements and the RFP process. Applications received by the County for ESG funds were reviewed by a committee. One proposal was received for HMIS services and six proposals were

received for Housing Relocation and Stabilization Services. The committee considered the following factors when scoring proposals: quality of work with existing nonprofits; expertise; and, expenditure performance. The proposals were ranked and recommendations were made on which agencies to fund.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
 1. The County shall accomplish this requirement by working closely with the Subrecipient contracted to provide ESG services. This nonprofit has formerly homeless individuals on staff who will be consulted and will provide input as we update the policies & procedures for the program.
5. Describe performance standards for evaluating ESG.
 - 80% exit to permanent housing situation 54% or more of adult participants will have income from sources other than employment 40% or more of adult participants will increase income from sources other than employment 56% or more of all participants have mainstream (non-cash) benefits at exit from program 20% or more of adult participants have employment income 20% or more of adult participants increase employment income less than 30 days from program entry to move into permanent housing. At least 85% of the households that exited a rapid rehousing program to permanent housing should not become homeless again within a year

Attachments

HOME- Recapture Guidelines

Recapture Requirements: In the event the homeowners transfer ownership of the residence within 5 or less years of the date the homeowner receives the Erie County HOME Assistance, Erie County and the homeowners shall share in the net proceeds from the sale.

Definitions:

HOME Assistance: HOME funds are invested in a HOME assisted unit, as a direct subsidy to the homebuyer. This includes down payment and closing cost assistance, and second mortgages that finance the difference between fair market value and the homebuyer's first mortgage.

Homeowner Investment in House: Homeowner share of required downpayment on the HOME assisted house and any major capital improvements done to the house that are documented by receipts.

Net Proceeds from Selling the House: This is sales price minus repayment of any non-HOME loan balance and closing costs financed by the homeowner.

HOME Recapture: Amount owed Erie County.

Formula:

Example: Mr. and Mrs. Smith purchased a house in February of 2005 using HOME monies through the Erie County First Time Home Buyer Program. The purchase price was \$50,000. Erie County provided a \$6,000 loan toward closing costs and principal reduction on the primary mortgage. The Smiths contributed \$500 toward the required downpayment, \$0 toward closing costs, and obtained a bank mortgage of \$48,000 for the house. The Smiths purchased 4 new windows for \$1,000 and retained receipts for said purchase.

After living in the house for 3 years, the Smiths sold their home for \$55,000. There was 2 years remaining on the County required 5-year affordability period, and a principal balance of \$47,000 on their primary bank mortgage.

The Smiths are required to repay Erie County the net proceeds from the sale as calculated below.

		Net Proceeds		
HOME Assistance (\$6,000)	x	(\$55,000 - \$47,000)	=	HOME Recapture
HOME Assistance (\$6,000) + Homeowner Investment (\$1,000 for windows and \$500 for initial downpayment)		\$6,000 x \$8,000 = Owed to Erie County \$7,500		\$6,400

ESG- Standards- 1

A. Introduction

Erie County will continue to provide assistance to individuals and families that are homeless or at risk of becoming homeless through the use of Federal funds received by the County under the Emergency Solutions Grant Program (ESG). The County will continue to provide permanent housing to individuals and families that meet HUD definition of homeless and to very low income families at risk of becoming homeless.

The Program will consist of both the Rapid Re-housing and Homelessness Prevention components of the ESG Program. Housing relocation and stabilization services as well as financial assistance will be available to program participants. The County will contract with not-for-profit agencies that serve the homeless population to implement the Program and oversee the HMIS component of the program.

ESG- Standards-2

Evaluation of individuals' and families' eligibility for assistance

All program participants for the ESG Program must meet HUD definition for homelessness or at risk of homelessness. To determine eligibility for the program all potential program participants will be evaluated by intake staff or case managers using the Continuum Wide coordinated Entry Assessment Tool. The staff will determine the potential program participant's eligibility for assistance, type of assistance. The coordinated entry assessment form is completed within 5 days of intake/case manager at shelter. The Coordinated Entry Lead will then make referral to Rapid Rehousing based on their income, Vulnerability, Homeless history, Domestic violence status, household composition, and program availability.

The following is the criteria the client must meet in order to be eligible for homelessness prevention and rapid re-housing assistance:

HOMELESSNESS PREVENTION ASSISTANCE

The program participants must provide proof of residency in one of the Erie County CDBG Consortium communities.

Program participants must provide proof of income. Total household income must be below 30 percent of the area median income.

All program participants must meet the following HUD criteria for defining at risk of homelessness for individuals or families, unaccompanied children, youth, or families with children and youths where youths are defined as up to age 25:

Individual or family who will imminently lose their primary nighttime residence, provided that:

- (I) Residence will be lost within 14 days of the date of application for ESG Program:
- (ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing

Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing

RAPID RE-HOUSING ASSISTANCE

The program participants must reside in a homeless shelter or hotel/ motel paid for by Erie County Department of Social Services or other locations that meet HUD definition for homeless. The County will give priority to homeless individuals and families that meet HUD homeless definition and reside in the Erie County CDBG Consortium but, since there are no publicly or privately operated shelters in the Erie County CDBG Consortium, the County will also recruit program participants from designated homeless shelters in Buffalo, New York.

Individuals or family who lacks a fixed, regular, and adequate nighttime residence,

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;
- (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelter, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Fleeing/Attempting to flee domestic violence and the individual or family meet the above requirements.

ESG- Standards-3

Coordinating Services

Coordination services among other providers

Subrecipient staff participating in the County ESG Program will be required to become familiar with other agencies that provide services under the Buffalo/Erie County Continuum of Care (CoC) and make referrals when necessary. At intake, staff will be required to use the CoC common assessment tool to record program participant's personal data. The common assessment tool information will be recorded in the HMIS database which can be shared with other agencies that are part of the ESG Program. Staff will use the HMIS to refer program participants to other agencies that provide homeless assistance services. Staff will also accept referrals from other agencies that are part of the CoC.

The County will notify other homeless assistance providers of the services that will be available through the Erie County ESG Program. Subrecipient staff will be required to work directly with emergency shelter providers for referral for the Rapid Re-housing component of the Program. Staff will be on site at emergency shelters to interview potential program participants.

Mainstream Service and Housing Providers

The County, along with the Homeless Alliance of Western New York and Subrecipients for the County ESG Program, will meet with other mainstream service and housing providers to coordinate and integrate to the maximum extent practicable ESG funded activities. The County does not want to use ESG funds to duplicate activities that are already funded by the County or other agencies. The Subrecipient will be required to use the services of other mainstream service and housing providers when providing assistance to clients.

ESG- Standards-4

Prioritizing Individuals and Families for Assistance

Based on the housing needs of the homeless population in Erie County which is documented in the Buffalo/ Erie County Continuum of Care and overseen by the Homeless Alliance of Western New York, the County ESG program will continue to coordinate with the CoC to ensure that the needs of the homeless population in Erie County are met. Erie County's program will continue to prioritize individuals and families who resided in the CDBG consortium prior to entering a shelter. Priority is given to clients that have the longest homeless history and score higher on the Coordinated Entry Assessment.

Rapid Re-housing

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining and retaining housing to prioritize individuals and families that will receive assistance under the Rapid Re-housing component of the County ESG Program. Potential participants must meet HUD homeless definition.

Homelessness Prevention

The County, Homeless Alliance of WNY and service providers for the homeless developed a list of barriers to obtaining housing and retaining housing in order to prioritize individuals and families that will receive assistance under the Homelessness Prevention component of the County ESG Program. Potential participants must reside in the Erie County CDBG Consortium and meet HUD homelessness definition, must have an income less than 30% of the area median income, and must have at least 3 other barriers to obtaining housing and at least 3 barriers (other than economic) to retaining housing.

Participant Share for Rent and Utilities Costs

Upon entering the program, staff will ensure the rent is reasonable and will immediately start working with the program participant to obtain or confirm a source of income. The Case Manager will work to develop an individualized plan for each program participant to become stably housed. The plan will include a schedule for the participant to pay a portion of their rent and utilities, typically starting at 0%-30% and gradually increasing until the participant is paying the full amount of rent and utilities. Program participants will pay their share directly to the landlord and utility provider. The duration of assistance will depend on the household with a goal of 6 months of assistance and will not exceed 24 months.

ESG- Standards- 5

Duration of Assistance

The objective of the County ESG Program is to ensure program participants are stably housed before exiting the Program. Case managers will be required to develop a housing plan for each program participant on entering the Program. The housing plan will be tailored to the participant housing needs, but must address housing search, placement and sustainability. The case managers will review the housing plans monthly with the program participants and update the plans as needed. When it is determined the program participant is stably housed, the case manager will exit the client from the program. No participants will receive assistance for more than 24 months during a three year period.

Housing Stabilization and/or Relocation Services

As part of the County ESG Program Subrecipient case managers will be required to develop a housing plan for each program participant. The housing plan shall include the type and amount of housing stabilization and/or relocation services program participants will require in order to become stably housed. The services may include financial assistance costs, services costs, mediation, legal services and credit repair.

The services provided to program participants under financial assistance will include short and medium term rental assistance, rental application fees, security deposits, last month rent, utility deposits, utility payments and moving costs. The duration of these services will be determined by the case managers based on the progress the program participant is making to become stably housed. The maximum number of months a program participant may receive financial assistance and/or services is 24 months during a 3 year period.

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> New	<input type="checkbox"/>
<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Continuation	* Other (Specify): <input type="text"/>
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	<input type="text"/>
* 3. Date Received:		4. Applicant Identifier:
<input type="text"/> 01/09/2026		<input type="text"/>
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
<input type="text"/> B-26-UC-36-0001		<input type="text"/>
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text"/> Erie County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/> 16-6002558		* c. UEI: <input type="text"/> F5NUNMMKAXM9
d. Address:		
* Street1:	<input type="text"/> 95 Franklin Street	
Street2:	<input type="text"/>	
* City:	<input type="text"/> Buffalo	
County/Parish:	<input type="text"/>	
* State:	<input type="text"/> NY: New York	
Province:	<input type="text"/>	
* Country:	<input type="text"/> USA: UNITED STATES	
* Zip / Postal Code:	<input type="text"/> 14202-3967	
e. Organizational Unit:		
Department Name: <input type="text"/> Environment and Planning	Division Name: <input type="text"/> Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/> Mr.	* First Name: <input type="text"/> Paul	<input type="text"/>
Middle Name: <input type="text"/> J.	<input type="text"/>	
* Last Name: <input type="text"/> D'Orlando	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text"/> Principal Contract Monitor	<input type="text"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text"/> 716-858-2194	Fax Number: <input type="text"/> 716-858-7248	
* Email: <input type="text"/>		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CDBG program funds used for infrastructure improvements, economic development and housing rehabilitation assistance for low income areas of the Erie County Consortium.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

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.

<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
----------------------	---	--	--

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="2,994,630.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="350,000.00"/>
* g. TOTAL	<input type="text" value="3,344,630.00"/>

* 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

<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
----------------------	---	--	--

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: 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: 2501-0044
 Expiration Date: 02/28/2027

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 this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, 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 §§ 1.8, 3.115, 8.57, or 146.39.

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:	Mark
Middle Name:	C.		
*Last Name:	Poloncarz		
Suffix:			
*Title:	County Executive		

*Applicant Organization:

Erie County

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(d)) 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 subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing 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 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) 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. 3601-19), 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 applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; 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. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(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.

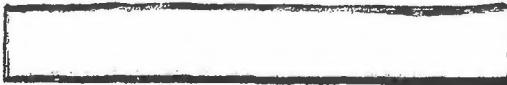
9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in 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-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at 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 as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

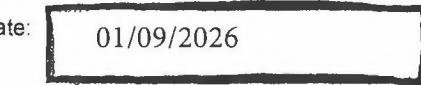
I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct.

WARNING: Anyone who knowingly submits 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, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

A rectangular box with a black border, used for redacting a signature.

*Date:

A rectangular box with a black border, used for redacting a date.

01/09/2026

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> New	<input type="checkbox"/>
<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Continuation	* Other (Specify): <input type="text"/>
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	
* 3. Date Received:	4. Applicant Identifier:	
<input type="text" value="01/09/2026"/>	<input type="text"/>	
5a. Federal Entity Identifier:	5b. Federal Award Identifier:	
<input type="text" value="M-26-UC-36-0001"/>	<input type="text"/>	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
<input type="text"/>	<input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="Erie County"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="16-6002558"/>		* c. UEI: <input type="text" value="F5NUNMMKAXM9"/>
d. Address:		
* Street1:	<input type="text" value="95 Franklin Street"/>	
Street2:	<input type="text"/>	
* City:	<input type="text" value="Buffalo"/>	
County/Parish:	<input type="text"/>	
* State:	<input type="text" value="NY: New York"/>	
Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="14202-3967"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Environment and Planning"/>	Division Name: <input type="text" value="Community Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Paul"/>	
Middle Name: <input type="text" value="J."/>		
* Last Name: <input type="text" value="D'Orlando"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Principal Contract Monitor"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="716-858-2194"/>		Fax Number: <input type="text" value="716-858-7248"/>
* Email: <input type="text"/>		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnership Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME program funds used for housing rehabilitation and rental assistance for low income residents of the Erie County Consortium.

Attach supporting documents as specified in agency instructions.

[Add Attachments](#)

[Delete Attachments](#)

[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.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	921,686.00
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	225,000.00
* g. TOTAL	1,146,686.00

* 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

Add Attachment

Delete Attachment

View Attachment

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: 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: 2501-0044
 Expiration Date: 02/28/2027

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 this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, 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 §§ 1.8, 3.115, 8.57, or 146.39.

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:	Mark
Middle Name:	C.		
*Last Name:	Poloncarz		
Suffix:			
*Title:	County Executive		
*Applicant Organization:	Erie County		

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(d)) 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 subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing 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 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) 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. 3601-19), 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 applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; 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. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

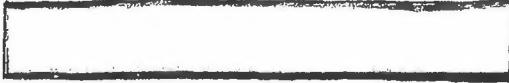
8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

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-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at 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 as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded 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 submits 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, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

A rectangular box with a black border, used for redacting a signature.

*Date:

01/09/2026

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> New	
<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Continuation	* Other (Specify):
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	
* 3. Date Received:	4. Applicant Identifier:	
01/09/2026		
5a. Federal Entity Identifier:	5b. Federal Award Identifier:	
E-26-UC-36-0001		
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
8. APPLICANT INFORMATION:		
* a. Legal Name: Erie County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 16-6002558		* c. UEI: F5NUNMMKAXM9
d. Address:		
* Street1:	95 Franklin Street	
Street2:		
* City:	Buffalo	
County/Parish:		
* State:	NY: New York	
Province:		
* Country:	USA: UNITED STATES	
* Zip / Postal Code:	14202-3967	
e. Organizational Unit:		
Department Name: Environment and Planning	Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Paul	
Middle Name: J.		
* Last Name: D'Orlando		
Suffix:		
Title: Principal Contract Monitor		
Organizational Affiliation:		
* Telephone Number: 716-858-2194		Fax Number: 716-858-7248
* Email: [REDACTED]		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

* 15. Descriptive Title of Applicant's Project:

ESG program funds used for assistance for the homeless population of the Erie County Consortium. Assistance included homeless prevention, rental assistance and stabilization services.

Attach supporting documents as specified in agency instructions.

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.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="234,812.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="234,812.00"/>

* 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

Add Attachment

Delete Attachment

View Attachment

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: 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: 2501-0044
Expiration Date: 02/28/2027

Instructions for the HUD-424-B Assurances and Certifications

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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:	Mark
Middle Name:	C.		
*Last Name:	Poloncarz		
Suffix:			
*Title:	County Executive		
*Applicant Organization:	Erie County		

- 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.
- Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) 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 subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
- 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 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) 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.
- Will comply with the Fair Housing Act (42 U.S.C. 3601-19), 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 applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; 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.

- Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.
- 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.
- 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) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.
- 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.
- 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-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at 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 as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded 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 submits 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, 3802; 24 CFR §28.10(b)(1)(ii)).

*Signature:

A rectangular box with a black border, used for redacting a signature.

*Date:

01/09/2026

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. 17011) and implementing regulations at 24 CFR Part 75.

Signature of Authorized Official 1/9/2026

Date

Erie County Executive

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.

Signature of Authorized Official

1/9/2026

Date

Erie County Executive
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(C):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which 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 to meet such needs.

Signature of Authorized Official _____ Date 1/9/2026

Erie County Executive

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

1/9/2026
Date

Erie County Executive

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation - If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs - In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation - Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds - The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality - The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement - To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan - All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

1/9/2026

Date

Erie County Executive

Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date

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.

TOWN OF HAMBURG, NEW YORK

2026 “Draft” Action Plan
April 1, 2026 - March 31, 2027
(2026 Program Year)



Hamburg Town Board
Supervisor Elizabeth Farrell-Lorentz
Councilman Frank M. Bogulski
Councilwoman Lynn Dixon
Councilman Daniel Kozub
Councilman Nicholas Ortiz

Hamburg Community Development

Timothy Regan; Assistant Director

Summary of 2026 CDBG Projects/Funding - Program Income - HOME Funds
2026 "Draft" Funding Allocations

Town of Hamburg 2026 Community Development Block Grant Award (Projected): \$400,000.00

Housing Renovation Conditional Grants	\$100,000.00
Town of Hamburg Infrastructure Reconstruction (Hamburg Highway)	\$100,000.00
Village of Blasdell; Infrastructure Reconstruction	\$100,000.00
Planning/Administraion	\$ 40,000.00
First Time Homebuyer Conditional Grants	\$ 40,000.00
Housing Counseling	\$ 10,000.00
Legal/Eviction Services	\$ 10,000.00

2026 CDBG "Program Income": \$125,000.00

Housing (Program Income)	\$ 25,000.00
Economic Development (Program Income)	\$100,000.00

TOTAL 2026 CDBG Funding: \$525,000.00

2026 HOME Program Funds (Erie County Consortium)	Total Grant	\$125,000.00
	\$ 31,250.00	
Administration (Consortium)	\$ 12,500.00	
CHDO (Consortium)	\$ 18,750.00	
Housing Renovation Conditional Grants for Income Eligible		\$ 93,750.00

TOTAL 2026 FUNDING (CDBG & HOME FUNDS): \$650,000.00



Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The Town of Hamburg, New York is a federal Community Development Block Grant (CDBG) Entitlement Community and is also part of the Erie County/Town of Hamburg HOME Consortium thus allowing the town to receive federal HOME Investment Partnership Program funding. Since the Town of Hamburg and the County of Erie are linked through the federal HOME program from the United States Department of Housing and Urban Development (HUD), the Town of Hamburg is required to file its Five Year Consolidated Plan as well as its Annual One Year Action Plan as part of Erie County Consolidated Plan/Annual Action Plan submission to HUD. The Town of Hamburg, New York is an “Entitlement Community” receiving its own Community Development Block Grant (CDBG) funding separate from the Erie County allocation. Because of the way this is set up within the regulations for the United States Department of Housing and Urban Development (HUD), the Town of Hamburg submits this document as a separate section within the Erie County Consortium Consolidated Plan/Action Plan submission. This section focuses on the Town of Hamburg, New York only as it relates to its housing and community development goals and objectives.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The 2026 Action Plan provides a framework to address the needs of the Town for the second year of the 2025-2029 Consolidated Plan using CDBG funds. The objectives guiding the proposed activities are:

- Provide Decent Affordable Housing
- Create Suitable Living Environments
- Provide essential infrastructure upgrades

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

- 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 economic opportunities, principally for low-to-moderate income persons. The main focus of the Town's program is in the area of housing and neighborhood preservation. The Program's broad goals can be accomplished by a variety of eligible activities including housing rehabilitation, improvements to public facilities and infrastructure such as sewers, waterlines, roads, and public services. In the past, the Town also used CDBG funds to create a suitable living environment by funding public services that improve the lives of its low-moderate income residents by providing services to seniors, food services, youth , and battered spouses as well as other eligible recipients.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The ACA from the Buffalo, NY HUD office showed that the Town of Hamburg is administering its federal CDBG funds in an effective/compliant manner. Hamburg identifies & tries to expend annual program funding within the same year it is awarded. The HUD review of the Hamburg program followed an approved Annual Action Plan. The activities undertaken during the year were consistent with the Towns Plan goals, objectives, & priority needs. Programs Administered & 2026 Funding Amounts- 2024 CDBG: \$435,351 Assessment Period: April , 2024–March 31, 2025. HUD's review of the CAPER determined that Hamburg followed the approved Plan during the 2024PY. Activities undertaken during the year are consistent with the Town's goals, objectives, & priority needs. Provide decent housing by preserving affordable housing stock, increase the availability of affordable housing, reduce discriminatory barriers, increase supportive housing for those with special needs. Provide a suitable living environment, more livable neighborhoods, increased housing opportunities, & 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/moderate income persons to achieve self-sufficiency. Actual 2024 PY expenditures recorded in IDIS reflect that the Town did expend funds in these broad categories and within the requirements of HUD funding regulations. Hamburg's 2024 CAPER was received on June 30, 2025 & the report was determined to be complete & included a description of Hamburg's progress/performance throughout the program year. Hamburg published the CAPER notice in the Hamburg Sun on May 30, 2025, public comment period of 5/30/25-6/16/25. Two public hearings were held during the comment period on June 11, 2025, at 10am & 4pm respectively. The 2024 CAPER was placed on the Town's website for residents to view and comments by mail/e-mail. No questions/concerns/comments were received. The Town responded to findings within an adequate time frame and the Buffalo Field office is currently working with the Town of Hamburg to address and close open findings. The Town of Hamburg has 1 subrecipient and does provide adequate oversight and regular monitoring. During PY2024, the Town monitored all housing program balances, loan pay offs, deposits & expenditures were reviewed monthly. All infrastructure projects were reviewed, & employees were interviewed. Payroll for infrastructure projects was reviewed to ensure Davis-Bacon

requirements. In January 2025, the Hamburg Development Corporation (HDC) was monitored and all HDC loans were reviewed. The Town of Hamburg maintains experienced staff capable of administering and overseeing the HUD funded programs. According to the Town's PR26 CDBG Financial Summary Report, during PY 2024, the Town of Hamburg spent 96.28% of its non-administrative funds on activities that benefited low/moderate income persons. Activities reported appear to meet a national objective. Program activities were adequately described during the reporting period. CDBG funds were spent on activities that were eligible under program rules. Some of the PY2024 accomplishments include 2 major infrastructure reconstruction projects with 1,915 beneficiaries impacted; 15 L/M income households were assisted. Hamburg expended \$21,850.42 (3.72%) of its spending on Planning/Administration which is within the 20% limit. Hamburg expended \$79,506.88 or 14.24% of its spending on Public Services which is within the 15% limit. Hamburg received \$152,562.64 in program income. Hamburg maintains data in IDIS in a timely & accurate manner. The Town met the timeliness test for January 31, 2025, with a timeliness ratio of 1.09%.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Town of Hamburg held four (4) public hearings during the fall 2025 for citizen/public participation and input for our 2026 Community Development Block Grant process. These in-person hearings were held at the Town of Hamburg Community Development Offices (6122 South Park Avenue). The dates and times of the public hearings are listed below:

Monday, September 22, 2025 @ 6:30 p.m.

Monday, September 29, 2025 @ 6:30 p.m.

Monday, October 6, 2025 @ 6:30 p.m.

Monday October 20, 2025 @ 6:30 p.m.

Furthermore, pursuant to measures addressing the COVID-19 pandemic and aftermath, the Town of Hamburg also had a specific e-mail address (cdpublichearing@townofhamburgny.gov) for receipt of funding requests and/or public comments. The public hearing notice was available on the town's webpage and within the town's official newspaper, The Hamburg Sun, legal notices on September 19, 2025. These measures were taken in accordance with the town's revised Citizen Participation Plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The following comments were received during our public hearing process: Monday, September 22, 2025 - 6:30 p.m.: No persons attended the public hearing. No e-mail requests were received. Monday, September 29, 2025 - 6:30 p.m.: No persons attended the public hearing. No e-mail requests were received. Monday, October 6, 2025 - 6:30 p.m.: No one attended the public hearing and no e-mail requests were received. Monday, October 20, 2025 - 6:30 p.m.: No persons attended the public hearing. No e-mail requests were received. Funding applications were submitted by three groups prior to the upcoming application deadline. They were all accepted. During the 2026 Action Plan hearing process, attendance was again lower than pre-pandemic levels. While we again had in-person hearings within a town building, the general public neglected to attend some of the hearings. The publication of information for the hearings was once again placed onto the town and department websites as well as within the official newspaper "The Hamburg Sun". The specific e-mail address for public hearing information/request was utilized minimally as well.

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

All public comments were accepted.

7. Summary

The Town of Hamburg continues to administer its CDBG program as best it can with its limited capacity.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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 & Planing

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Hamburg Community Development

6100 South Park Avenue

Hamburg, NY 14075

(716) 648-6216

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The public participation process for the 2026 Action Plan involved four specific, general public hearings as well as stakeholder consultations and individual contacts. Housing, social service agencies, and other organizations serving the Town of Hamburg were consulted during the development of this Action 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)).

Housing, social service agencies, and other organizations serving the Town of Hamburg were consulted during the development of this Action Plan. See the listings under 2 below:

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 continues to help homeless individuals/families via assistance to local outreach agencies and with legal assistance via two specific agencies. (The Center for Elder Law and Justice and Neighborhood Legal Services)

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

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Belmont Housing Resources for WNY, Inc.
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Constant consultation is conducted throughout the year to ensure client needs are being met and that specific counseling is being completed (budget, credit, debt and foreclosure counseling) is completed per the annual contact. The Town of Hamburg goes out to an RFP for these services every two years and has worked with Belmont Housing Resources for WNY for several decades pertaining to specific counseling for clients.
2	Agency/Group/Organization	Center for Elder Law and Justice
	Agency/Group/Organization Type	Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Center for Elder Law & Justice is an additional resource for legal and eviction services utilized by the Town of Hamburg. Consultation is conducted on an as needed basis per client needs.
3	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL, INC.
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing and Mobility Counseling

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Constant consultation is conducted throughout the year to ensure client needs are being met and that public education is completed per the annual contact. The Town of Hamburg has contracted with HOME, Inc. for several decades pertaining to Fair Housing, educational issues for our residents as well as legal assistance with clients.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

All agencies wishing to be included were consulted/heard. Consultation with Erie County was also completed due to the cooperation with the Action Plan and similar agencies. No agencies wishing to be consulted/heard were not included.

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	Erie County	Goals are part of the Erie Conty plan as lead agency for Continuum of Care

Table 3 - Other local / regional / federal planning efforts

Narrative

Even though the Town of Hamburg is a stand-alone Community Development Block Grant grantee, it is also part of the Erie County/Town of Hamburg HOME Consortium, thus requiring direct interaction with all Erie County agencies or agencies contracted by Erie County for Continuum of Care services.

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The Town of Hamburg held four (4) public hearings during the summer/fall 2025 for citizen/public participation and input for our 2026 Community Development Block Grant process. These in-person hearing were held at Town of Hamburg Community Development (6122 South Park Avenue) The dates and times of the public hearings are listed below:

Monday, September 22, 2025 @ 6:30 p.m.

Monday, September 29, 2025 @ 6:30 p.m.

Monday, October 6, 2025 @ 6:30 p.m.

Monday, October 20, 2025 @ 6:30 p.m.

Furthermore, pursuant to measures addressing the COVID-19 pandemic and aftermath, the Town of Hamburg also had a specific e-mail address (cdpublichearing@townofhamburgny.gov) for receipt of funding requests and/or public comments. The public hearing notice was available on the town's webpage and within the town's official newspaper, The Hamburg Sun, legal notices on September 19, 2025. These measures were taken in accordance with the towns revised Citizen Participation Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	Monday September 22, 2025 - 6:30 p.m. (Community Development): No persons attended the public hearing. No e-mail requests were received.	None Received	None Received	
2	Public Hearing	Non-targeted/broad community	Monday September 29, 2025 - 6:30 p.m. (Community Development): No persons attended the public hearing. No e-mail requests were received.	None Received	None received	
3	Public Hearing	Non-targeted/broad community	Monday October 6, 2025 - 6:30 p.m. (Community Development): No persons attended the public hearing. No e-mail requests were received.	None Received	None 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)
4	Public Hearing	Non-targeted/broad community	Monday October 20, 2025 - 6:30 p.m. (Community Development): Funding Applications were submitted by three groups prior to the upcoming application deadline.	Funding request application received	All were accepted	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Town of Hamburg's highest priorities for 2026 include infrastructure/street improvements, housing rehabilitations, as well as comprehensive fair housing, and housing counseling programs 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 2024 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	400,000.00	125,000.00	0.00	525,000.00	0.00	

Table 5 - Expected Resources – Priority Table

Annual Action Plan
2026

14

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

Additional resources from both the Town of Hamburg and the Village of Blasdell will be utilized to enhance the federal CDBG funding to be received. Matching requirements, if any, will be completed with in-kind services such as waiver of building inspection permit fees, highway department workers during milling/paving, and Village Department of Public Works during milling/paving. It is anticipated that leveraged funds will equate to \$700,000+

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

N/A

Discussion

N/A

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities and Infrastructure Improvements	2025	2029	Non-Housing Community Development	Village of Blasdell Exception Target Area #4 Town of Hamburg Exception Target Area #9	Public Facilities and Infrastructure Improvements	CDBG: \$200,000.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 200 Households Assisted
2	Fair Housing	2025	2029	Affordable Housing	Town Wide	Public Services and Fair Housing	CDBG: \$20,000.00	Public service activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
3	Improve Housing Stock - Renovation	2025	2029	Affordable Housing	Town Wide	Improve Housing Stock	CDBG: \$100,000.00	Homeowner Housing Rehabilitated: 5 Household Housing Unit
4	Improve Housing Stock - Homeownership Assistance	2025	2029	Affordable Housing	Town Wide	Improve Housing Stock	CDBG: \$40,000.00	Direct Financial Assistance to Homebuyers: 2 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities and Infrastructure Improvements
	Goal Description	
2	Goal Name	Fair Housing
	Goal Description	
3	Goal Name	Improve Housing Stock - Renovation
	Goal Description	
4	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 2026 include infrastructure/street improvements, housing renovations, public services and grants to assist first-time homebuyers. The Town of Hamburg also completes comprehensive fair housing, housing counseling, and legal/eviction services as 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 American Community Survey (ACS). 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, unless circumstances such as the COVID pandemic prevent such speedy expenditures. 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	Housing Renovation Grants
3	Blasdell Infrastructure Reconstruction
4	Homeownership Assistance - First Time Homebuyer
5	Fair Housing Services
6	Housing Counseling
7	Legal/Eviction Services
8	Job Creation
9	Program Planning/Administration

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles 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 #11
	Goals Supported	Public Facilities and Infrastructure Improvements
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	:
	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	3/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	100
	Location Description	
	Planned Activities	
2	Project Name	Housing Renovation Grants
	Target Area	Town Wide
	Goals Supported	Improve Housing Stock - Renovation
	Needs Addressed	Improve Housing Stock
	Funding	:
	Description	Conditional grants to low/moderate income residents for repairs to their owner-occupied dwellings. Roofs, windows, furnaces, electrical, etc.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	Blasdell Infrastructure Reconstruction
	Target Area	Village of Blasdell Exception Target Area #6
	Goals Supported	Public Facilities and Infrastructure Improvements

	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	:
	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	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
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	:
	Description	Conditional grants to income qualified first time homebuyers. Up to \$20,000 per grant.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	Fair Housing Services
	Target Area	Town Wide
	Goals Supported	Fair Housing
	Needs Addressed	Public Services and Fair Housing
	Funding	:
	Description	Funding for Fair Housing services for town residents via a contract with Housing Opportunities Made Equal.

	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	Housing Counseling
	Target Area	Town Wide
	Goals Supported	Fair Housing
	Needs Addressed	Public Services and Fair Housing
	Funding	:
	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	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	Legal/Eviction Services
	Target Area	Town Wide
	Goals Supported	Fair Housing
	Needs Addressed	Public Services and Fair Housing
	Funding	:
	Description	Legal and eviction services to eligible residents in an effort to prevent homelessness.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Job Creation
	Target Area	Town Wide
	Goals Supported	Fair Housing
	Needs Addressed	Economic Development
	Funding	:
	Description	Job creation for low income clients via loans to for profit businesses.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	Program Planning/Administration
	Target Area	Town Wide
	Goals Supported	Fair Housing
	Needs Addressed	Improve Housing Stock
	Funding	:
	Description	Planning/Admin
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

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

Funding will be utilized within HUD target areas based upon the 2024 ACS or directly to income eligible persons/families only. Target area projects to be determined.

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	25
Town of Hamburg Exception Target Area #5	
Village of Blasdell Exception Target Area #6	25
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	
Town Wide	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Funding is utilized within HUD target areas based upon the 2024 ACS or directly to income eligible persons/families.

Discussion

The town of Hamburg continues to utilize its federal CDBG funding for 100% low and moderate income persons. This data is supported by the HUD Annual Community Assessment for the Town of Hamburg.

Annual Action Plan
2026

25

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

Introduction

In May, 2016, the Town of Hamburg passed its latest Fair Housing law update (original law was passed in 1986). This 2016 amendment included the first Inclusionary Zoning ordinance within the State of New York. This specific portion of the towns Fair Housing (Section 109-11 of the Code of the Town of Hamburg, New York - Affirmatively furthering fair housing) states the following:

It shall be the policy of the Town to affirmatively further fair housing by adopting zoning ordinances which promote the inclusion of affordable rental housing in all multi-family developments of eight or more units.

A) Affordable housing shall be defined as housing for which rent and utilities shall constitute no more than thirty percent of the gross annual income for a household whose income is greater than fifty percent but does not exceed eighty percent of the Erie County median income.

B) The Town shall offer a density bonus which allows the developer to increase the number of market-rate units permitted to be built on a site at a rate of one additional market-rate unit for each affordable unit.

C) In calculating the number of affordable units, the total number of proposed units shall be multiplied by ten percent. If the product produces a fraction, a fraction of 0.5 shall be rounded up to the next higher whole number and a fraction of less than 0.5 shall be rounded down to the next lower whole number.

D) In order to assure integration within a multi-family development, affordable units shall not be clustered, but mixed with market-rate units. Additionally, the exterior appearance of affordable units shall be made similar to market-rate units by the provision of exterior finishes and materials of substantially the same type and quality.

E) Developers shall be required to maintain affordability of designated units for a period of not less than thirty years from the date a certificate of occupancy is issued. In the event a multi-family development is sold, the new owner shall be responsible for maintaining affordability of units for the balance of the regulatory period.

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

In addition to the above inclusionary zoning portion of the Town of Hamburg Fair Housing law, the Town has also passed a resolution in 2022 to

permanently waive any and all fees for clients of our housing programs, thus making it more affordable for them.

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; Legal Aid Bureau of Buffalo and also with other agencies such as Neighborhood Legal Services; Center for Elder Law and Justice; 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 other municipalities as well as Erie County departments to address said needs. Further, needs are also brought to public meetings and hearings throughout the year

Actions planned to foster and maintain affordable housing

The Town of Hamburg has been and will continue 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 2% interest rate loans.

Actions planned to reduce lead-based paint hazards

Any client/family proceeding through any of our housing programs will have their home checked for lead and if needed be cleared for lead during the renovation 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 continued annually.

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 agencies and other municipalities continues to be effective.

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 that directly benefits town residents. Examples are contracts with Housing Opportunities Made Equal, Inc.; Belmont Housing Resources for WNY; Legal Aid Bureau of Buffalo and also with other agencies such as Neighborhood Legal Services; Center for Elder Law and Justice; 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(l)(1,2,4)

Introduction

Projects planned with CDBG funds are expected to be available during the year are identified in the Projects Table (2026). The following identifies program income that should be available for use for projects to be accomplished.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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	125,000
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:	125,000

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

The Town of Hamburg continues to utilize its Community Development Block Grant funding 100% for low and moderate income areas and persons. This has been identified within our CAPER and within the HUD Annual Community Assessment by the Buffalo, NY HUD office.

Attachments

Citizen Participation Comments

Town of Hamburg, New York; 2026 PY Public Hearing Report

The following comments were received during our public hearing process: Monday, September 22, 2025 - 6:30 p.m. (Community Development): No people attended the public hearing. No e-mail requests were received.

Monday, September 29, 2025 - 6:30 p.m. (Community Development): No people attended the public hearing. No e-mail requests were received.

Monday, October 6, 2025 – 6:30 p.m. (Community Development): No one attended the public hearing, and no e-mail requests were received.

Monday, October 20, 2025 - 6:30 p.m. (Hamburg Town Hall): No people attended the public hearing. No e-mail requests were received. Funding applications were submitted by three groups prior to the upcoming application deadline. They were all accepted

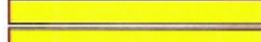
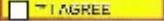
During the 2026 Action Plan hearing process, attendance was again lower than pre-pandemic levels. While we again had in-person hearings within a town building, the general public neglected to attend some of the hearings. The publication of information for the hearings was once again placed onto the town and department websites as well as within the official newspaper “The Hamburg Sun”. The specific e-mail address for public hearing information/requests was not utilized (CDpublichearing@townofhamburgny.gov).

Grantee SF-424's and Certification(s)

OMB Number: 4000-0009
Expiration Date: 11/30/2026

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Pre-Application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* 3. Previous award representative identity: <input type="text"/>	* 4. Other (Specify): <input type="text"/>
* 5. Date Received: <input type="text"/>	4. Award Identifier: <input type="text"/>		
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>		
State Use Only:			
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>		
8. APPLICANT INFORMATION:			
* 8a. Legal Name: <input type="text"/>			
* 8b. Employer/Employer Identification Number (DIN/INN): <input type="text"/>		* 8c. LER: <input type="text"/>	
8d. Address:			
* Street: <input type="text"/>			
8e. City: <input type="text"/>			
8f. County/Parish: <input type="text"/>			
* 8g. State: <input type="text"/>			
8h. Province: <input type="text"/>			
* 8i. Country: <input type="text"/>			
* 8j. Zip/Postal Code: <input type="text"/>			
8k. Organizational Unit:			
Department Name: <input type="text"/>	Division Name: <input type="text"/>		
8l. Name and contact information of person to be contacted on matters involving this application:			
Prefix: <input type="text"/>	* First Name: <input type="text"/>		
Middle Name: <input type="text"/>			
* Last Name: <input type="text"/>			
Suffix: <input type="text"/>			
Title: <input type="text"/>			
Organization Affiliation: <input type="text"/>			
* Telephone Number: <input type="text"/>		Fax Number: <input type="text"/>	
* Email: <input type="text"/>			

Application for Federal Assistance SF-424***9. Type of Applicant 1: Selected Applicant Type:** City or Township Government**Type of Applicant 2: Other Applicant Type****Type of Applicant 3: Selected Applicant Type***** Other (Specify)*****10. Name of Federal Agency:** US DEPARTMENT OF HOUSING & URBAN DEVELOPMENT**11. Catalog of Federal Domestic Assistance Number:** 14.218**CFDA Title:** COMMUNITY DEVELOPMENT BLOCK GRANT/URBAN DEVELOPMENT***12. Funding Opportunity Number:****Title:****13. Competition Identification Number:****Title:****14. Areas Affected by Project (Cities, Counties, States, etc.):*****15. Descriptive Title of Applicant's Project:** COMMUNITY DEVELOPMENT BLOCK GRANT 2026 ENTITLEMENT GRANT**Attach supporting documents as specified in agency instructions:**

Application for Federal Assistance SF-424			
16. Congressional Districts Of:			
*a. Applicant	23		
*b. Program/Project			
Address or list of Program/Project Congressional Districts if needed.			
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
17. Proposed Project:			
*a. Start Date	04/01/2026		
*b. End Date			
18. Estimated Funding (\$):			
*a. Federal	700,000.00		
*b. Applicant			
*c. State			
*d. Local			
*e. Other			
*f. Program Income	125,000.00		
*g. TOTAL	825,000.00		
*19. Is Application Subject to Review By State Under Executive Order 12372 Process?			
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>			
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.			
<input type="checkbox"/> c. Program is not covered by E.O. 12372.			
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes," provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
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)			
<input type="checkbox"/> 			
** The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.			
Authorized Representative:			
Prefix:	<input type="text"/> Mrs.	* First Name:	<input type="text"/> MELISSA
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text"/> CHARLES LAMBERT		
Suffix:	<input type="text"/>		
* Title:	<input type="text"/> SUPERVISOR		
* Telephone Number:	<input type="text"/> (616) 549-6111 Ext. 2181	Fax Number:	<input type="text"/>
* Email:	<input type="text"/> melissa.lambert@mi.rr.com		
* Signature of Authorized Representative:			* Date Signed: <input type="text"/> 01/08/2026

**Applicant and Recipient
Assurances and Certifications**

**U.S. Department of Housing
and Urban Development**

**OMB Number: 2501-0004
Expiration Date: 02/28/2027**

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-B. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.10, 3.115, 5.50, and 140.25, 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 §§ 1.8, 3.115, 8.57, or 140.39.

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: Mrs. **First Name:** ELIZABETH
Middle Name:
Last Name: PARKER-LORENZ
Suffix:

Title:

***Applicant Organization:** DORN OF HINBURY

- Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capacity (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 those 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.
- Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color, 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 tribal designee, tribal authority is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).
- Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 704), as amended, and implementing regulations at 24 CFR part B, the Americans with 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 (42 U.S.C. 6101-04) 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.
- Will comply with the Fair Housing Act (42 U.S.C. 3601-19), 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 applicant which is an Indian tribe or its instrumentality which

is excluded by statute. If coverage does not make this certification, 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 §§ 1.10(a) and 5.105 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. 4601) and implementing regulations at 24 CFR part 24 and, as applicable, Section 104(c) of the Housing and Community Development Act of 1974 (42 U.S.C. 5004(c)) 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 project.

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 will complete and submit Standard Form LL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all levels (including sub grants and contracts) to similarly comply and disclose accordingly. Federally recognized Indian Tribes and tribal designee housing entities (TDEs) established by Federally recognized Indian Tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the RFA. As a result, tribal Federally recognized Indian Tribes and TDEs established under State law are not subject to 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 submits 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. (48 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

*Signature:

*Date:

01/08/2026

OMB Control No: 2506-0117 (exp. 09/30/2021) | Form HUB-424-B (07/23) | Page 1 of 1 | Last Revision Date: 07/23/2023

Form HUB-424-B (07/23)

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.

Signature of Authorized Official

1/18/26

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) 2022, 2023, 2024 [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.

Signature of Authorized Official

1/8/26
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.

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0000
Expiration Date: 08/31/2020

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal interest in the title of real property in accordance with awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4753) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residential structures.
10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1688), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1944 (42 U.S.C. §§220d-3 and 250 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276e-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §674), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-284) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of
- Federal actions to State (Clean Air Implementation Plans under Section 178(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470f; EO 11583 (identification and protection of historic properties); and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under this award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
			
APPLICANT ORGANIZATION		DATE SUBMITTED	
			

SF-424D (Rev. 7-87) Back