

ANNUAL ACTION PLAN

October 1, 2014 to September 30, 2015

Community Development Block Grant

HOME Investment Partnerships

Emergency Solutions Grant

Housing Opportunities for Persons with AIDS



CITY OF BUFFALO

Byron W. Brown, Mayor

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OVERVIEW

The City of Buffalo is required to prepare an Annual Action Plan to receive funding from the U.S. Department of Housing and Urban Development under four entitlement programs: Community Development Block Grant, Home Investment Partnerships, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS. The 2014 AAP outlines activities and projects in relationship to the goals and objectives in the city's 2013/17 Consolidated Plan.

The city will receive approximately \$17.3 million in entitlement funding for the 2014 program year. This will be combined with \$1.8 million in program income from loan repayments and the sale of property that previously received federal assistance. This leverages millions of additional dollars in state, local, and private funding; and enhances neighborhoods across the city by supporting housing rehabilitation, clearance of abandoned properties, public facilities and infrastructure, public services, and economic development. [Map 1]

Total	\$19,154,513
CDBG grant	\$13,003,257
CDBG program income	\$1,450,000
HOME grant	\$2,711,001
HOME program income	\$350,000
ESG grant	\$1,090,546
HOPWA grant	\$549,709

The city is shifting from a May 1 – April 30 program year to an October 1 – September 30 one. Beginning the program year in May made it difficult to prepare, bid, contract for, and carry out construction projects before winter weather arrived. Starting in October will allow the city to prepare the necessary documents and obtain bids over the winter, so that construction on housing and public facilities can begin as soon as the weather breaks in the spring.

Two public hearings are held each year to obtain citizen input on the Annual Action Plan. These are announced through notices in the *Buffalo News*, *Buffalo Criterion*, and *La Ultima Hora*. The city also distributes over 700 notices to individuals, block clubs, and community groups electronically and by mail. A public hearing regarding community development needs was held on April 8, 2014; and another will be held on July 15 to review the final Annual Action Plan with residents.

Funds from the four entitlement programs will be directed to the following activities: housing, clearance, public facilities, public infrastructure, public services, economic development, and administration.

Total	\$19,154,513	
Housing	\$4,373,200	23%
Clearance	\$1,910,000	10%
Community facilities	\$2,650,000	14%
Public infrastructure	\$2,010,000	10%
Human services	\$3,632,600	19%
Economic development	\$1,284,600	7%
Administration	\$3,294,113	17%

HOUSING

The Emergency Repair Program provides CDBG funding for repairs to ensure safe conditions for low- and moderate-income homeowners. Program funds are used to address major deficiencies, including roof replacement, heating, electrical, and plumbing system repairs, and interim controls to alleviate lead-based paint hazards. Funds may also be used for minor repairs to correct a single code violation or hazard. It is anticipated that up to 95 homeowners will be served. Program delivery costs support the efforts of loan administrator Belmont Shelter, community-based organizations that provide housing services in eligible neighborhoods, and city staff.

The Owner-Occupied Rehab Program provides HOME funding for the substantial rehabilitation of existing one- to four-family units, to ensure the availability of decent, safe, and affordable housing for extremely low-, very low-, low-, and moderate-income households. Program funds will be used for rehab expenses in targeted neighborhoods, or as matching funds for other targeted programs, including interim controls to alleviate lead-based paint hazards. The city distributes funding through an RFP process. Proposals are rated based on the market analysis provided, cost effectiveness, development team experience and qualifications, M/WBE participation, and the amount of outside funding being leveraged. It is anticipated that up to 20 units will be assisted, although it is difficult to project the exact number of units before proposals are submitted. The RFP process allows the city to prioritize projects that provide the greatest number of rehabbed units for the lowest HOME investment, in order to maximize program benefits.

The Multi-Family Rehab/Construction Program provides HOME funding for the rehabilitation of investor-owned structures (or identified problem properties), or for the construction of new rental units to ensure the availability of decent, safe, and affordable housing for very low-, low-, and moderate-income renters. Program funds will be used for rehab expenses in targeted neighborhoods that bring assisted units into compliance with building codes, including interim controls or abatement to alleviate lead-based paint hazards. As with the owner-occupied program, the city distributes this funding through an RFP process. It is anticipated that up to 35 units will be rehabbed or built, although it is difficult to project the exact number of units prior to the submission of proposals.

Community Housing Development Organizations (CHDOs) receive a 15 percent set aside of the city's HOME allocation to acquire and rehabilitate housing. This money is distributed based on proposals

submitted by the CHDOs. As with the other substantial rehabilitation programs, the city prioritizes projects that provide the greatest number of units for the lowest HOME investment. CHDOs also receive a five percent set aside from the HOME allocation to cover their program delivery costs on these projects.

Total	\$4,373,200
Emergency repairs: owners	\$684,300
Substantial rehab: owners	\$1,000,000
Substantial rehab / new construction: rentals	\$1,212,700
Acquisition / rehab: CHDOs	\$406,650
Program delivery: CHDOs	\$135,550
Program delivery: Belmont	\$396,000
Program delivery: CBOs	\$352,000
Program delivery: City	\$186,000

CLEARANCE

CDBG funding will be used to demolish blighted residential, commercial, and industrial properties in targeted neighborhoods. The city works from a list of vacant properties that have been abandoned and fallen into public ownership, or that have a court order to be demolished. Prior to demolition, all properties are approved by the State Historic Preservation Office, and city-owned properties are also reviewed by the Buffalo Preservation Board. The city then prioritizes the list of eligible properties by identifying those that are an imminent threat to the surrounding community. Before clearance begins, the city will attempt to ensure that any salvageable materials are removed for reuse. Structures are also tested for asbestos and abated if necessary. It is anticipated that up to 70 structures will be demolished, although commercial and industrial properties often cost significantly more than residential ones, and thus lowers the ultimate number of demolitions.

Total	\$1,910,000
Demolitions	\$1,700,000
Program delivery: City	\$210,000

COMMUNITY FACILITIES

CDBG funding will be used to make improvements to community centers and parks located in eligible low- and moderate-income neighborhoods. Many of the human services provided to youth and seniors take place at city-owned facilities. A plan has been developed that will allow repairs at 14 community centers to be addressed over the next six program years. Structural repairs such as roofs, walls, and foundations will be taken care of first; followed by plumbing, HVAC, and electrical systems; and finally interior finishes and fixtures. This will allow the most serious building issues to be addressed before they become larger problems. The two parks in this year's plan will both see the addition of shelters to house concessions and other operations. Program delivery costs support city staff who work directly on these projects. [Map 2]

Total	\$2,650,000
Autumnwood Senior Center	\$200,000
Gloria Parks Community Center	\$540,000
Hennepin Park Community Center	\$22,000
Hope Center / Polonia Hall	\$45,000
Northwest Buffalo Community Center	\$770,000
Schiller Park Senior Center	\$33,000
Manhattan Park	\$275,000
Walden Park	\$275,000
A/E and Contingency	\$390,000
Program delivery: City	\$100,000

PUBLIC INFRASTRUCTURE

CDBG funding will be used to resurface deteriorated streets and replace damaged sidewalks in eligible low- and moderate-income neighborhoods. The Department of Public Works provides an annual list of streets that require resurfacing and sidewalks that need replacement. Based on HUD guidelines, the city conducts a three-part review for each to determine eligibility. The first step is a check to ensure that each street segment is located within an eligible low- to moderate-income neighborhood. The second step requires the city to count the individual parcels on both sides of the street, and confirm that at least 51 percent are currently in residential use; not vacant, commercial, industrial, or institutional. The final step takes the estimated cost of resurfacing the street or replacing the sidewalks for each segment, and divides it by the total number of residential parcels, to allow the city to rank improvements from most to least cost effective. Program delivery costs support city staff who work directly on these projects. [Map 3]

Total	\$2,010,000
Streets	\$1,063,500
Sidewalks	\$846,500
Program delivery: City	\$100,000

There are 19 street segments on the paving list; these will be completed as funding allows.

<i>Street</i>	<i>Segment</i>	<i>Est cost / residence</i>
Roslyn	Genesee to north end	\$664
Pooley	Grant to Dewitt	\$671
LaSalle	Bailey to Eggert	\$709
Roslyn	Lang to Delavan	\$760
Wright	Delavan to north end	\$767
Sunset	Hertel to Race	\$879
Glenwood	Fillmore to east end	\$923
Schuele	Ferry to Delavan	\$996
St Joseph	Walden to West Shore	\$1,084
Bird	Niagara to Grant	\$1,100
Page	Hertel to Race	\$1,118
W. Woodside	South Park to Hopkins	\$1,130
Livingston	Ferry to Lafayette	\$1,176
Burgard	Genesee to Hazel	\$1,220
Johnson	Sycamore to Broadway	\$1,221
Montana	Ferry to Genesee	\$1,355
Persia	Doat to north end	\$1,581
Marion	Elmwood to Bridgeman	\$2,862
Red Jacket	South Park to Scott	\$6,374

There are 31 sidewalk segments on the repair/replacement list; these will be completed as funding allows.

<i>Sidewalk</i>	<i>Segment</i>	<i>Est cost/residence</i>
Riverside	Tonawanda to Ontario	\$413
Humason	Genesee to Heminway	\$427
Sanders	Delaware to Colvin	\$806
Hazelwood	Delavan to Easton	\$867
Courtland	Delavan to Easton	\$903
Eller	Genesee to Heminway	\$1,006
Wade	Filmore to Holden	\$1,030
Sprenger	Genesee to Heminway	\$1,097
Herman	Best to Genseee	\$1,184
Alamo	South Park to Abbott	\$1,216
Military	Austin to Amherst	\$1,303
Busti	Pennsylvania to Virginia	\$1,400
Montclair	Shawnee to Leroy	\$1,423
Richlawn	Shawnee to Leroy	\$1,462
Dash	Abbott to Macamley	\$1,541
Koons	Broadway to north end	\$1,553
Macamley	South Park to Abbott	\$1,640
Heath	Main to Cornell	\$1,667
Remoleno	South Park to Abbott	\$1,736
Brinkman	Walden to West Shore	\$1,739
Trenton	Hudson to Virginia	\$1,760
Farmer	East to Tonawanda	\$1,788
Marigold	Shawnee to Leroy	\$1,826
Sears	Broadway to Paderewski	\$1,952
Vermont	15th to West	\$2,000
Normal	Massachusetts to Vermont	\$2,027
Seventh	Pennsylvania to Virginia	\$2,308
Chenango	Ferry to Massachusetts	\$2,385
Hill	Wakefield to Leroy	\$2,773
Myers	Best to Genesee	\$2,857
Josie	South Park to Abbott	\$3,887

HUMAN SERVICES

The city will fund a number of non-profit agencies that provide services for the homeless, persons with AIDS, youth, and seniors; as well as activities such as fair housing, crime prevention, and literacy. HUD places a 15 percent cap on the amount of CDBG funding that can be directed to these services.

Total	\$3,632,600
Homeless	\$1,009,000
Persons with AIDS	\$533,500
Youth	\$817,700
Seniors	\$753,000
Other	\$519,400

Homeless

ESG funding provides support to assist the homeless and other special needs populations. Applications are submitted to the city, and then reviewed, rated, and recommended for funding by the Continuum of Care steering committee, a group that has been designated by HUD to coordinate homelessness efforts in the region. City representatives sit in on the review panel discussion, but do not rate applications.

Street Outreach funding is used to locate homeless persons in shelters, soup kitchens, and on the street; and to secure appropriate services and case management for them. Shelter funding will be directed to five emergency shelter operators – City Mission, Compass House, Matt Urban Center, Salvation Army, and Vive; and four transitional housing providers – FLARE Teaching and Restoring Youth, Gerard Place, Saving Grace Ministries, and YWCA, for operating expenses and support services.

Since persons in poverty are the most susceptible to becoming homeless, prevention funding will be provided to Neighborhood Legal Services to assist tenants facing eviction. The city initiated a Rapid Rehousing Demonstration Project during the current program year to help homeless individuals and families reclaim permanent housing. This effort will be carried forward in the 2014 program year, with a Request for Proposals distributed to solicit interest in delivering this service. Finally, the Homeless Alliance of Western New York will receive funding to oversee the HUD-mandated Homeless Management Information System (HMIS).

	<i>All activities</i>	<i>Outreach</i>	<i>Shelter</i>	<i>Prevention</i>	<i>RRH</i>	<i>HIMS</i>
Total	\$1,009,000	\$150,000	\$407,000	\$50,000	\$352,000	\$50,000
City Mission	\$115,000		\$115,000			
Compass House	\$55,000		\$55,000			
FLARE TRY	\$33,500		\$33,500			
Gerard Place	\$33,500		\$33,500			
HAWNY	\$50,000					\$50,000
Matt Urban	\$175,000	\$150,000	\$25,000			
NLS	\$50,000			\$50,000		
Salvation Army	\$60,000		\$60,000			
Saving Grace	\$35,000		\$35,000			
Vive	\$30,000		\$30,000			
YWCA	\$20,000		\$20,000			
RFP	\$352,000				\$352,000	

Persons with AIDS

HOPWA funding is used to assist individuals and families who are either HIV-positive or living with AIDS. As the only HOPWA grantee in the region, HUD requires that the city provide these services to all residents of Erie and Niagara counties. There are roughly 2,300 persons in both counties who are known to be HIV-positive, with another 550 to 600 potentially undiagnosed.

The city will provide HOPWA funds to Evergreen Health Services and the Red Cross to assist with delivering tenant-based rental assistance; short-term rent, mortgage, and utility assistance; permanent housing placement; and supportive services (with and without housing).

	<i>All activities</i>	<i>TBRA</i>	<i>STRMU</i>	<i>PHP</i>	<i>SS (with)</i>	<i>SS (w/out)</i>
Total	\$533,500	\$130,000	\$73,500	\$74,500	\$198,500	\$57,000
Evergreen	\$360,500	\$130,000		\$32,000	\$198,500	
Red Cross	\$173,000		\$73,500	\$42,500		\$57,000

Youth

CDBG funding will assist 15 agencies that offer youth programming at 21 facilities, many of which are city-owned. These are either located in eligible low- and moderate-income neighborhoods, or income-qualify participants to make sure that at least 51 percent are from low- or moderate-income households. [Map 4]

Total	\$817,700
African Cultural Center	\$54,700
Belle Center	\$60,000
Computers for Children	\$39,200
CRUCIAL	\$56,000
Delavan Grider Community Center	\$49,100
Gloria Parks Community Center	\$59,300
King Urban Life Center	\$31,900
Matt Urban Center	\$77,300
North Buffalo Community Center	\$36,700
Northwest Buffalo Community Center	\$104,700
Old First Ward Community Center	\$21,500
Pratt Willert Community Center	\$39,700
Seneca-Babcock Community Center	\$20,700
West Side Community Services	\$78,500
Police Athletic League	\$88,400
Asarese Matters Community Center	
Hennepin Park Community Center	
JFK Recreational Center	
Lanigan Park Fieldhouse	
Lincoln Community Center	
Machnica Community Center	
Tosh Collins Community Center	

Seniors

CDBG funding will assist 18 agencies that offer senior programming at 20 facilities, many of which are city-owned. Although seniors automatically qualify as a low- or moderate-income population, the overwhelming majority of these facilities are located in eligible low- and moderate-income neighborhoods. [Map 4]

Total	\$753,000
ABLEY	\$68,800
Delavan Grider Community Center	\$25,900
FLARE	\$16,500
Friends	\$12,900
Gloria Parks Community Center	\$39,700
Hispanics United of Buffalo	\$20,100
Matt Urban Center	\$55,400
North Buffalo Community Center	\$43,300
Northwest Buffalo Community Center	\$88,700
Old First Ward Community Center	\$23,400
PEOPLE	\$20,400
Pratt Willert Community Center	\$16,100
Schiller Park Community Center	\$80,500
Seneca-Babcock Community Center	\$20,700
South Buffalo Community Association	\$105,600
Valley Community Association	\$20,100
West Side Community Services / CEM / Los Tainos	\$61,500
William Emslie YMCA	\$33,400

Other human services

CDBG funding will assist 11 agencies that provide a variety of other services to city residents. Most of these agencies income qualify their participants, to ensure that they come from low- or moderate-income households. Services include fair housing, foreclosure assistance, crime prevention and anti-violence, and employment assistance.

Total		\$519,400
Back to Basics	Anti-violence	\$24,000
Belle Center	AmeriCorps	\$64,500
Buffalo Urban League	Foreclosure	\$35,800
CEO	Employment	\$60,000
Citizen Services (City of Buffalo)	Crime prevention	\$146,700
HOME	Fair housing	\$59,300
Legal Aid Bureau	Foreclosure	\$55,200
Literacy Volunteers	Literacy	\$10,300
Neighborhood Legal Services	Fair housing	\$27,900
West Side Community Services	Crime prevention	\$20,000
West Side NHS	Translation	\$15,700

ECONOMIC DEVELOPMENT

The city is obligated to repay previous Section 108 loan guarantees based on a repayment schedule established by HUD. Program delivery funding will be used to contract with the New York Business Development Corporation to manage the city's existing portfolio of business loans.

Total	\$1,284,600
Section 108 loan repayment	\$1,175,600
Program delivery: NYBDC	\$109,000

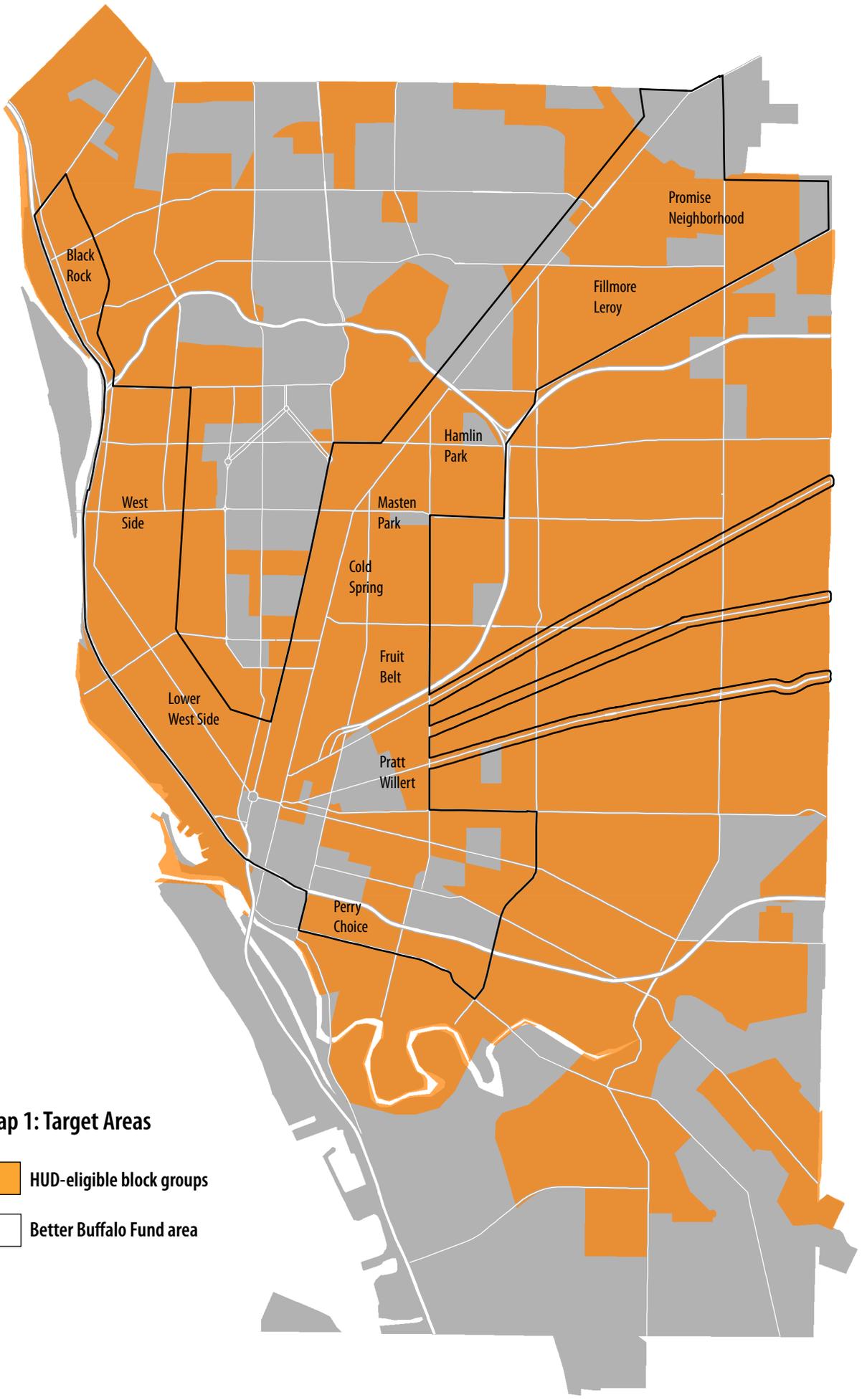
PLANNING & ADMINISTRATION

Each entitlement grant allows the recipient to use a portion of the funding to administer the program. For CDBG, this can be up to 20 percent of the grant award; for HOME, 10 percent; for ESG, 7.5 percent; and for HOPWA, 3 percent. The city provides some of its administration funding to the Buffalo Urban Renewal Agency, to assist with the management of these programs. It is also providing a share of its ESG admin funding to the Homeless Alliance of Western New York to assist with their ongoing efforts in establishing a coordinated entry system, and standardized policies and procedures for agencies providing these services.

Administration covers the planning and development of programs, as well as the programmatic and fiscal delivery of services. It includes monitoring the overall performance of agencies and projects against benchmarks, in addition to ensuring adherence to federal regulations. Administrative funds also provide support for managing HUD-mandated activities from prior program years, such as loan processing and project administration.

Total	\$3,294,113
CDBG: City	\$2,890,257
HOME: City	\$306,101
ESG: City	\$61,546
ESG: Homeless Alliance of WNY	\$20,000
HOPWA: City	\$16,209

APPENDIX A: MAPS

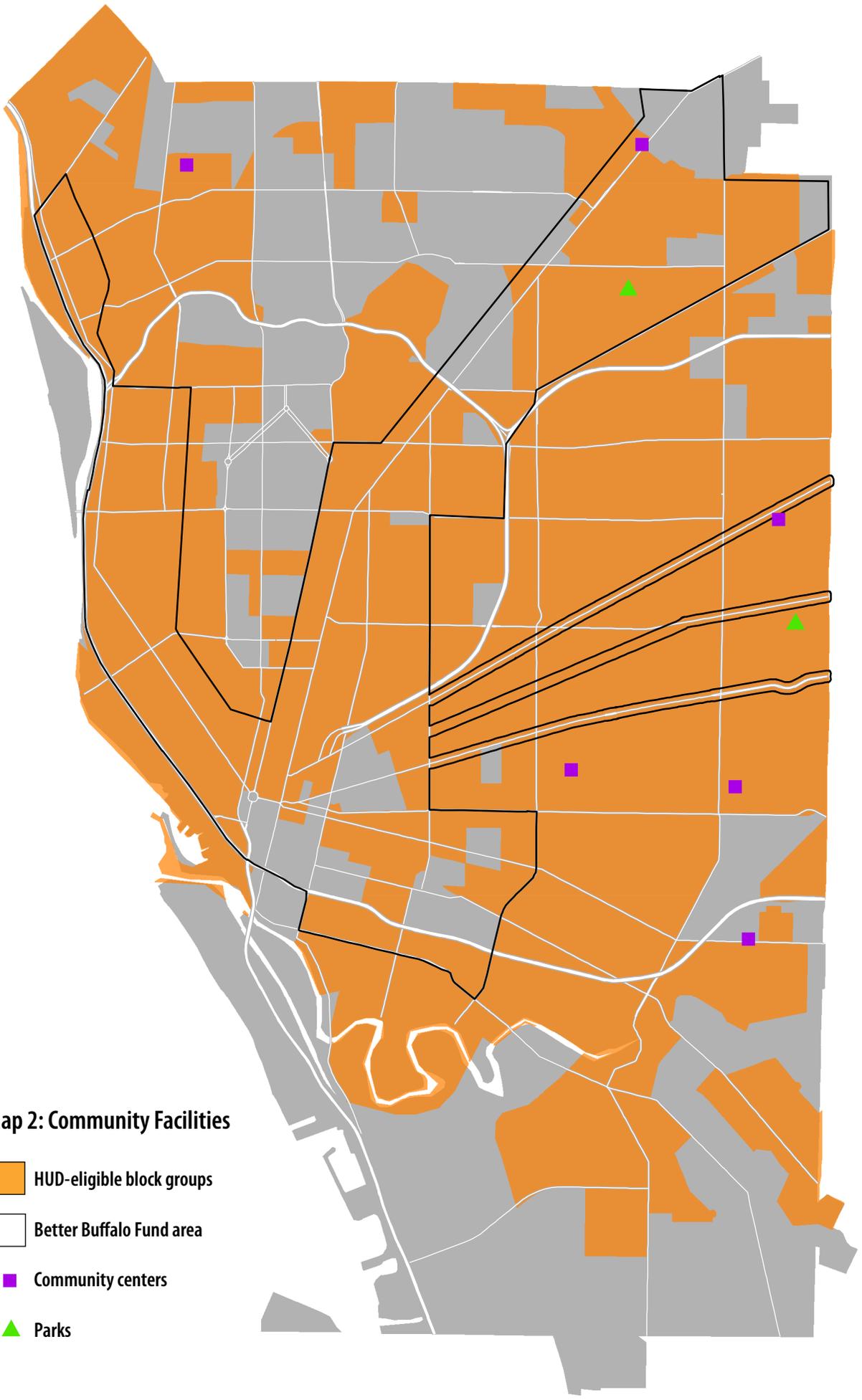


Map 1: Target Areas

-  HUD-eligible block groups
-  Better Buffalo Fund area

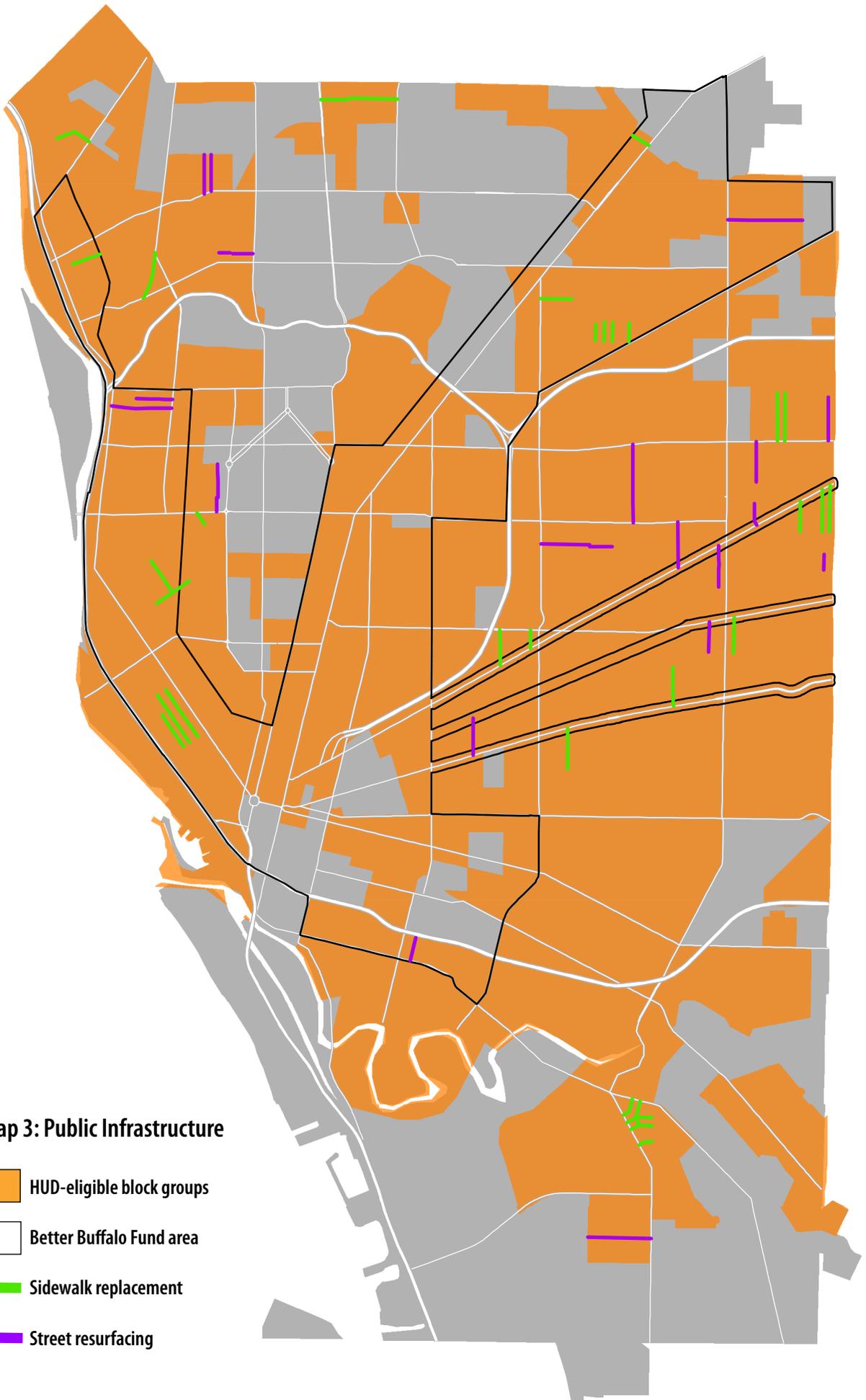
Map 2: Community Facilities

-  HUD-eligible block groups
-  Better Buffalo Fund area
-  Community centers
-  Parks



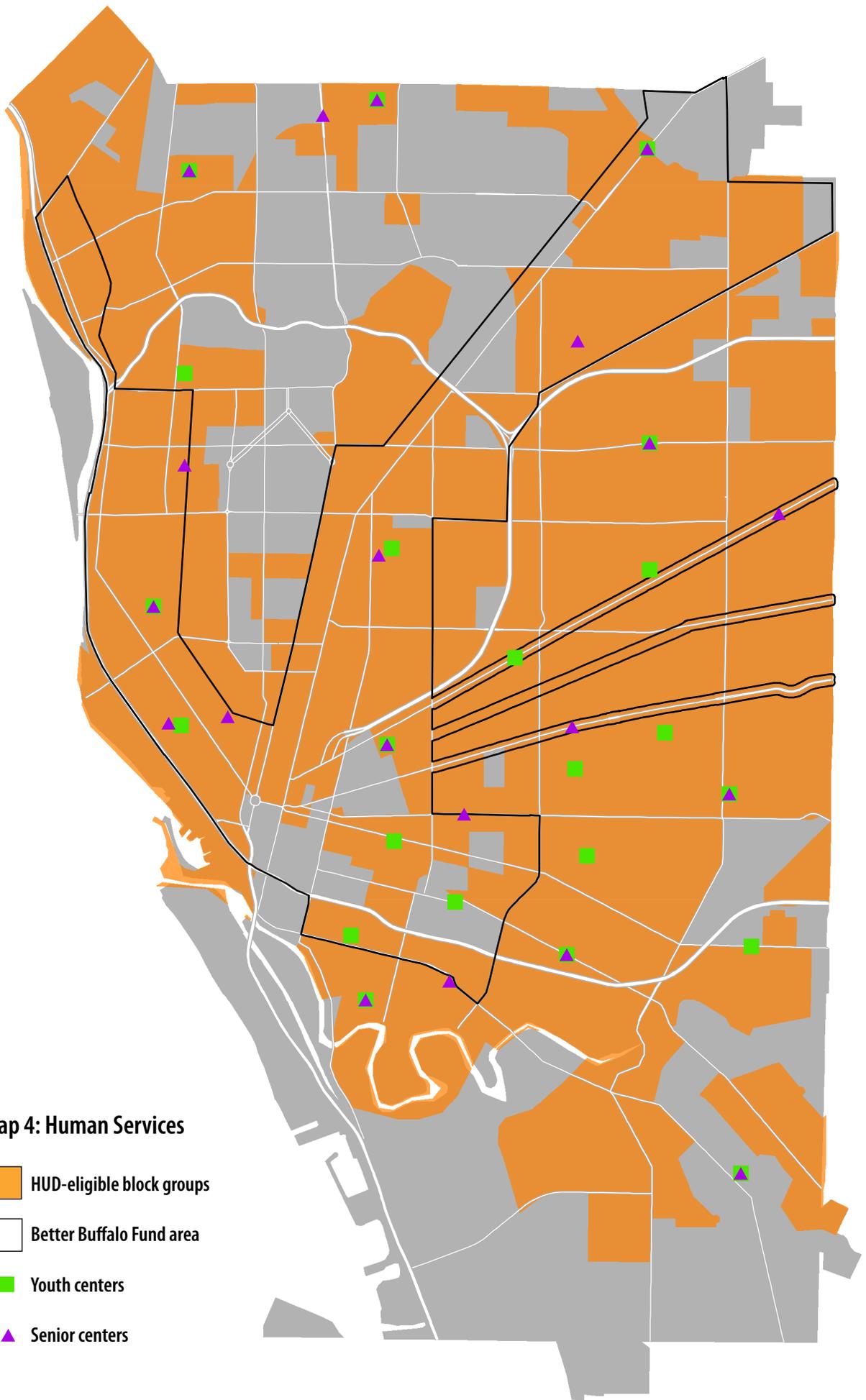
Map 3: Public Infrastructure

-  HUD-eligible block groups
-  Better Buffalo Fund area
-  Sidewalk replacement
-  Street resurfacing



Map 4: Human Services

-  HUD-eligible block groups
-  Better Buffalo Fund area
-  Youth centers
-  Senior centers



APPENDIX B: HUD EXHIBITS

AP-05: EXECUTIVE SUMMARY

The City of Buffalo is required to submit an Annual Action Plan in order to receive HUD funding under four entitlement programs: Community Development Block Grant, HOME Investment Partnerships, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS.

The 2014 AAP covers the period from October 1, 2014 to September 30, 2015, and identifies projects that address critical needs within the city. CDBG funds are used to assist with the development of viable neighborhoods by providing decent housing, a suitable living environment, and economic opportunities for low- and moderate-income persons. HOME funds support the construction and rehabilitation of affordable housing for low- and moderate-income renters and homeowners. ESG funds help to prevent homelessness, and address the housing and supportive service needs of homeless individuals and families. HOPWA funds provide housing assistance and related supportive services for persons living with HIV/AIDS and their families.

Objectives and outcomes

The city takes a balanced approach to investing the entitlement funds that it receives each year.

Housing: Almost \$4.4 million in CDBG and HOME funding will be used for up to 95 loans to owner-occupants for emergency repairs; to renovate, convert, and construct up to 55 units of affordable rental housing; and to provide for program delivery by non-profit partners and Community Housing Development Organizations.

Clearance: \$1.9 million in CDBG funding will support the remediation and demolition of up to 70 vacant and abandoned residential, commercial, and industrial structures.

Public facilities: Almost \$2.7 million in CDBG funding will be used to upgrade six community centers and two parks, serving approximately 7,500 persons annually.

Public infrastructure: \$2 million in CDBG funding will be used to resurface up to 19 streets, and replace sidewalks on up to 31 streets, serving roughly 5,300 persons.

Public services: Over \$2 million in CDBG funding will be used to support 33 non-profits that provide programming for youth, seniors, and those needing legal assistance, serving approximately 21,000 persons.

Homeless: \$959,000 in ESG funding will be used to assist non-profits who provide street outreach, emergency shelter, prevention, and rapid rehousing to over 9,000 persons.

Special needs: \$533,500 in HOPWA funding will be used to provide housing assistance, placement, and supportive services for persons with HIV/AIDS, serving over 300 households.

Economic development: \$109,000 will go to program delivery to administer the city's loan portfolio; and \$1,175,600 will repay prior Section 108 loans.

Planning and administration: Approximately \$3.3 million will be used to administer these four programs.

<i>Goal</i>	<i>Objective</i>	<i>Funding</i>	<i>Source</i>	<i>Outcome</i>	
Residential rehabilitation	DH-2	\$2,618,300	CDBG	95	units
Housing production	DH-1	\$1,754,900	HOME	35	units
Clearance	DH-3, SL-3	\$1,910,000	CDBG	TBD	buildings
Public services	SL-1	\$2,090,100	CDBG	30,998	persons
Public facilities	SL-3	\$4,660,000	CDBG	8,000	persons
Economic development	EO-1, EO-3	\$109,000	CDBG	NA	
Section 108 repayment	NA	\$1,175,600	CDBG	NA	
Street outreach	SL-1	\$150,000	ESG	300	persons
Emergency shelter	SL-1	\$407,000	ESG	6,793	persons
Prevention	DH-2	\$50,000	ESG	2,000	persons
Rapid rehousing	DH-2	\$352,000	ESG	65	households
Housing assistance	DH-2	\$203,500	HOPWA	115	households
Housing placement	DH-2	\$74,500	HOPWA	75	households
Supportive services	DH-2	\$255,500	HOPWA	115	households
Planning/administration	NA	\$3,294,113	Various	NA	

Evaluation of past performance

The city's recent performance has been marked by a period of relative inactivity, while projects were suspended as legal issues related to program administration were worked out; followed by an intense period of catching up and spending the funding that had accrued. The city enters the 2014 program year having successfully addressed the issues identified by HUD.

HUD has also allowed the city to adjust the dates of its program year from May – April to October – September. This will have two positive benefits. First, the city will be more likely to know the amount of funding that it will receive when preparing its AAP. In the past, HUD has seldom known the amounts that would be available through these four programs, forcing the city to guess at its anticipated allocations, develop an AAP, and then revise it when the final funding amounts were announced. With a program year that starts in October, it is unlikely that the federal government will not have determined funding amounts by the time the city is tasked with preparing its AAP.

Second, a program year that began in May made it difficult to provide all of the necessary pre-construction activities in time to bid, award, and complete jobs by the end of that year's construction season. With an October start date, the city will be able to handle all preconstruction activities over the winter; obtain bids when contractors are looking for work, rather than when they're trying to fit jobs in; and start construction early enough to finish by the end of the season. For housing, clearance, public facilities, and public infrastructure, this will make a huge difference.

The gradual decline in funding levels has forced the city to reexamine its priorities, and tighten up where it directs investments. Under CDBG, the primary focus is on emergency home repairs, clearance of vacant and abandoned structures, improvements to community centers and parks, repairs to streets and sidewalks, and provision of public services. With respect to economic development, the only current activities being funded are the required repayment of Section 108 loans, and the administration of prior loans made to businesses. HUD has also tasked the city with reducing the number of agencies that it funds within the 15 percent public service cap. This year the city revised its funding application and used a rating sheet developed by TDA, Inc., HUD's technical assistance provider. Next year the city will work closely with agencies that received low ratings to improve their operations and encourage partnerships with more stable organizations.

HOME funding is now completely allocated via a Request for Proposals process. This allows the city to identify projects that have already lined up site control, funding, and a development team, and provide the financing needed to bring these projects to reality in a short timeframe.

ESG has seen the successful implementation of the Rapid Rehousing Demonstration Project, and the city will be issuing another RFP to continue this effort. Through close work with the Continuum of Care, the city has been able to develop a program that best meets the needs of the homeless community, and directs funding to efforts that provide the most return on investment.

Finally, the HOPWA program has continued apace, guided by the strength of the agencies that administer these projects, two of which consolidated their operations during the past program year.

Citizen participation and consultation process

The city has provided many opportunities for citizens to offer input regarding the Annual Action Plan. The preparation and adoption schedule was posted on the city's website, and over 700 notices were mailed or e-mailed to block clubs, non-profits, and other interested parties. A public hearing was held on April 8, 2014 to encourage citizen input at the start of the process. A draft of the Annual Action Plan was posted on the city's website, and presented at a public hearing on July 15, 2014. A 30-day comment period that concluded on August 14 gave citizens an opportunity to offer comments.

The city also meets regularly with a wide range of stakeholders to receive on-going input on community development needs. Consultations take place with housing CBOs; non-profits that provide public services to youth, elders, and special needs populations; block clubs, neighborhood groups, and business associations; educational institutions; and other local governments. These meetings provide an opportunity to build upon the extensive consultation that took place during preparation of the city's 2013/17 Consolidated Plan.

Public comments

The city received written comments in support of continued ESG funding for transitional housing, and commending its efforts in partnering with the Continuum of Care in addressing needs in the homeless community. It also received comments from Crisis Services, Family Promise of WNY, and WNY Law Center regarding their public service applications and allocations. All comments, along with the city's responses, are included in the Annual Action Plan. The city accepts and responds to all comments that are submitted.

AP-10: CONSULTATION

The city meets regularly with various stakeholders to receive on-going input on community development needs. Consultations take place with housing CBOs; non-profits that provide public services to youth, elders, and special needs populations; block clubs, neighborhood groups, and business associations; educational institutions; and other local governments. These meetings provide an opportunity to build upon the extensive consultation that took place during preparation of the city's 2013/17 Consolidated Plan.

Input from the community, including comments received from individual citizens as well as agencies, contribute to the city's establishment of housing and community development goals. This is particularly true regarding input received from human service agencies, since statistics and data are limited. The city also relies on the input of community-based organizations to help identify housing and community development needs in various neighborhoods.

During the development of its 2013/17 Consolidated Plan, the city employed a more formal process to obtain input from community development stakeholders. Focus group meetings were held early in the process with affordable housing providers, fair housing advocates, business associations, homeless and special needs providers, community-based organizations, and health and human service agencies. Surveys were also distributed to these organizations to obtain more detailed information on community needs.

Coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies

The city coordinates with leadership of the Buffalo Municipal Housing Authority on items of mutual interest. Much of this has recently centered on the BMHA's preparation of a grant application for implementation of its Perry Choice Neighborhood initiative. While this was not funded during the past round, the BMHA intends to revise and resubmit its proposal.

The city also meets with local Community-Based Organizations and Community Housing Development Organizations to assess housing needs within various neighborhoods, and discuss approaches for targeting investments.

The city also consults with foundations, research institutions, and the Department of Social Services regarding the human service needs of low-income persons, and attends meetings of the poverty coalition.

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 city works closely with the Continuum of Care to identify homeless needs, using its 10-year plan to end homelessness as a guide. As a result of this consultation process, the city has begun to focus ESG funding on street outreach, emergency shelter, prevention, and rapid rehousing.

City representatives attend monthly meetings with homeless providers that the Continuum of Care sponsors. These providers are active in all phases of the ESG program, and allow the city to better understand how this funding fits into the larger picture, and where program improvements can be made.

The city has also worked closely with a consortium of groups that are attempting to develop transitional and permanent housing options for veterans.

Consultation with the Continuum of Care in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop policies and procedures for the operation and administration of HMIS

The Continuum of Care Review Committee is provided with the applications for ESG funding that the city receives, and rates each using a scorecard developed by TDA, Inc., HUD’s technical assistance provider. The committee then meets to discuss the merits of each application, and provides funding recommendations to the city.

The city has also worked with the Continuum of Care to develop written policies and procedures for coordinated entry, emergency shelter, transitional housing, permanent housing, rapid rehousing, and supportive services. It is expected that these will be completed during the 2014 program year.

The city provides ESG funding to the Continuum of Care to license and manage the HMIS, which includes training users, enforcing security policies and data quality standards, and providing reports to HUD.

Agencies, groups, organizations, and others who participated in the process and the jurisdiction’s consultations with housing, social service agencies, and other entities

BUFFALO MUNICIPAL HOUSING AUTHORITY
Public Housing Needs
Regular meetings; better coordination.
ELLCOTT DISTRICT COMMUNITY DEVELOPMENT
Services: Housing; Neighborhood Organization
Housing Need Assessment
Regular meetings; targeted housing efforts.
FILLMORE-LEROY AREA RESIDENTS, INC. (FLARE)
Services: Housing; Elderly Persons; Neighborhood Organization
Housing Need Assessment
Regular meetings; targeted housing efforts.
MATT URBAN CENTER
Services: Housing; Children; Elderly Persons; homeless; Neighborhood Organization
Housing Need Assessment; Homeless Needs - Chronically homeless, Families with children
Regular meetings; targeted housing efforts.

OLD FIRST WARD COMMUNITY ASSOCIATION
Services: Housing; Children; Elderly Persons; Neighborhood Organization
Housing Need Assessment
Regular meetings; targeted housing efforts.
UNIVERSITY HEIGHTS COMMUNITY DEVELOPMENT ASSOCIATION
Services: Housing; Children; Elderly Persons; Neighborhood Organization
Housing Need Assessment
Regular meetings; targeted housing efforts.
WEST SIDE NEIGHBORHOOD HOUSING SERVICES
Services: Housing; Neighborhood Organization
Housing Need Assessment
Regular meetings; targeted housing efforts.
HOMELESS ALLIANCE OF WESTERN NEW YORK
Services: Homeless
Homeless Needs - Chronically homeless; Families with children; Veterans; Unaccompanied youth Homelessness Strategy
Regular meetings with all homeless providers to obtain input on homeless needs.

AP-12: PARTICIPATION

The city encouraged residents and other stakeholders to provide input throughout the process of preparing its 2014 Annual Action Plan. Notices for public hearings are published in the Buffalo News and Buffalo Criterion; and bi-lingual notices are published in La Ultima Hora and mailed to over 700 addresses, emailed to over 300 persons, and posted on the city's website. The locations of the public hearings were ADA accessible, and the notices provided contact information for anyone needing special accommodations.

The city held an initial public hearing at the Central Library on April 8, 2014. The meeting outlined the adoption process, provided background information on the city's goals and objectives, and asked residents to share their thoughts on housing and community development needs, to be provided either at the meeting or within a 30-day comment period.

Project proposals for the AAP are evaluated by staff for eligibility with program regulations and performance measures, and funding recommendations are provided to the Mayor. Proposals for ESG funding are reviewed by the Continuum of Care Committee, with recommendations made to the city. The Mayor reviews these recommendations and submits a proposed AAP to the Common Council. The Council then reviews the AAP before it is released for public comment.

A second public hearing was held at the American Red Cross on July 15, 2014. This meeting reviewed the draft AAP, which was also posted on the city's website. Those attending were given the opportunity to comment on the draft AAP, and a 30-day comment period ran through August 14. Residents, community-based agencies, or other interested stakeholders wishing to comment on the AAP could do so by email or postal mail.

April 8, 2014

Type: Public hearing

Targeted outreach: Minorities, Spanish-speaking, persons with disabilities

Attendance: 28

Oral comments: A participant asked if rapid rehousing funds would be available; city responded that a rapid rehousing program will be included under ESG funding, with an RFP to be issued at a later date.

A participant asked if applications for public service funding are available; the city responded that the application material will be posted on the city's web site within the next couple of days.

Written comments: None received

July 15, 2014

Type: Public hearing

Targeted outreach: Minorities, Spanish-speaking, persons with disabilities

Attendance: 19

Oral comments: A participant read a statement regarding her concerns with cuts to shelters and transitional housing to focus on rapid rehousing; the city noted that Teaching and Restoring Youth's transitional housing services were being funded at the same level as last year.

A participant asked how notices were distributed; the city responded that it sends out 70 notices by e-mail and over 600 by postal mail, and constantly updates and expands the contact list.

A participant asked if there was any hope for new agencies to receive public service funding; the city replied that the performance of existing agencies will be given more emphasis in the future, so it will be possible for new agencies to be considered for funding.

A participant asked if high performing agencies will be rewarded; the city indicated that it hopes to be able to reward existing agencies that have exhibited sound fiscal and program performance.

A participant asked if the performance monitoring was new; the city responded that it conducts program and fiscal monitoring each year, but will be following up with low performing agencies more vigorously. As the pie keeps getting smaller and awards to agencies lower, the city needs to revisit how it distributes funding. Guidelines are in the city's application package posted on its web site.

Written comments: Teaching and Restoring Youth submitted a written copy of the oral comments provided at the hearing (see above).

The Homeless Alliance of WNY submitted comments commending the city for its willingness to work with the Continuum of Care in addressing the needs of the homeless.

Family Promise of WNY submitted comments asking why its ESG application was denied; the city responded that the Continuum of Care Committee had ranked the proposal below the level used as a cutoff for emergency shelter funding, and also expressed concerns that its approach does not follow the Housing First principles promoted by HUD.

Crisis Services submitted comments asking why its ESG application was denied; the city responded that the Continuum of Care Committee had ranked its proposals for street outreach and emergency shelter below the level used as a cutoff for these activities, and also expressed concerns regarding its current performance.

WNY Law Center submitted comments asking why its CDBG public service application was denied; the city responded that its claim to provide services to almost 120,000 eligible low- and moderate-income persons throughout the city was not consistent with HUD's definition of what constitutes a public service.

AP-15: EXPECTED RESOURCES

<i>Program</i>	<i>Uses</i>	<i>Year 2 Allocation</i>	<i>Year 2 Prog inc</i>	<i>Year 2 Total</i>	<i>Years 3 to 5 Total</i>
Total		\$17,354,513	\$1,800,000	\$19,154,513	\$53,500,000
CDBG	Housing repairs Clearance Public facilities Public services Economic development Admin/planning	\$13,003,257	\$1,450,000	\$14,453,257	\$40,000,000
HOME	Housing repairs Substantial rehab New construction	\$2,711,001	\$350,000	\$3,061,001	\$9,000,000
ESG	Street outreach Emergency shelter Transitional housing Prevention Rapid re-housing HMIS	\$1,090,546	\$0	\$1,090,546	\$3,000,000
HOPWA	Housing assistance Housing placement Supportive services	\$549,709	\$0	\$549,709	\$1,500,000

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

CDBG

Funding to community-based organizations for the delivery of housing programs leverages additional resources from state and private sources. The funding spent on clearance activities leverages additional money from the city’s general fund and capital improvement budget. Agencies that receive funding for public services bring in additional funding from federal, state, county, foundations, and other private sources.

HOME

Proposals for funding to rehabilitate, construct, or convert structures for affordable housing will consider the amount of matching funds being provided as a criteria for award.

ESG

These funds require a minimum one-to-one match on the part of the recipient. The current match, coming from other federal, state, county, and private sources that have been secured by sub-recipients, is over \$2.3 million.

HOPWA

This program is exempt from matching requirements; however the sub-recipients receiving funds have identified over \$3.3 million in additional federal, state, county, and private sources to assist with the services being provided.

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

Whenever feasible, the city will consider the use of publicly-owned land for the construction of affordable housing for low- and moderate-income households.

AP-20: ANNUAL GOALS AND OBJECTIVES

<i>Project</i>	<i>Category</i>	<i>Area</i>	<i>Need addressed</i>	<i>Outcome</i>	<i>Indicator</i>
Emergency repairs - owners	AH	Citywide	Affordable housing	95	units
Substantial rehab - owners	AH	Citywide	Affordable housing	20	units
Substantial rehab - renters	AH	Citywide	Affordable housing	35	units
Clearance	NHCD	Low-mod	Community development	70	units
Public facilities	NHCD	Low-mod	Community development	7,475	persons
Public infrastructure	NHCD	Low-mod	Community development	5,300	persons
Public services	NHCD	Low-mod	Community development	21,210	persons
Street outreach	Homeless	Citywide	Homelessness	300	persons
Emergency shelter	Homeless	Citywide	Homelessness	6,793	persons
Prevention	Homeless	Citywide	Homelessness	2,000	persons
Rapid rehousing	Homeless	Citywide	Homelessness	65	households
Housing assistance	NHSN	Citywide	Special needs	115	households
Housing placement	NHSN	Citywide	Special needs	75	households
Supportive services	NHSN	Citywide	Special needs	115	households
Economic development	NHCD	Low-mod	Economic development	NA	
Section 108 repayment	NHCD	Low-mod	Economic development	NA	
Planning and admin				NA	

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing

It is estimated that 150 extremely low-, low-, and moderate-income families will receive assistance.

AP-35: PROJECT SUMMARY

The AAP outlines projects under four entitlement grants: CDBG funds will be used for housing rehabilitation, clearance of abandoned properties, community center and park repairs and upgrades, street and sidewalk improvements, public services, economic development assistance, program delivery, and planning and administration; HOME funds will be used for substantial rehabilitation and new construction, CHDO activities, program delivery, and administration; ESG funds will be used for street outreach, emergency shelter and transitional housing, prevention, rapid rehousing, HMIS reporting, and administration; and HOPWA funds will be used for housing assistance, permanent housing placement, supportive services, and administration.

<i>Project</i>	<i>CDBG</i>	<i>HOME</i>	<i>ESG</i>	<i>HOPWA</i>	<i>Total</i>
Emergency repairs - owners	\$1,618,300				\$1,618,300
Substantial rehab - owners		\$1,000,000			\$1,000,000
Substantial rehab - renters		\$1,754,900			\$1,754,900
Clearance	\$1,910,000				\$1,910,000
Public facilities	\$2,665,000				\$2,665,000
Public infrastructure	\$1,995,000				\$1,995,000
Public services	\$2,090,100				\$2,090,100
Street outreach			\$150,000		\$150,000
Emergency shelter			\$407,000		\$407,000
Prevention			\$50,000		\$50,000
Rapid rehousing			\$352,000		\$352,000
Housing assistance				\$203,500	\$203,500
Housing placement				\$74,500	\$74,500
Supportive services				\$255,500	\$255,500
Economic development	\$109,000				\$109,000
Section 108 repayment	\$1,175,600				\$1,175,600
Planning and admin	\$2,890,257	\$306,101	\$131,546	\$16,209	\$3,344,113

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

The plan attempts to allocate funding across a range of projects, to ensure that community development efforts are comprehensive. These neighborhoods have diverse needs, and funding must be dedicated to many different types of projects to begin making a difference.

CDBG funding is used for emergency home rehabilitation; homeownership counseling; park and recreational facility improvements; street resurfacing and sidewalk replacement; public facility repairs and upgrades; public services, and economic development assistance.

HOME funding is used for owner-occupied rehabilitation; acquisition, rehabilitation, and resale of housing; and multi-family rehabilitation and new construction. ESG funding is used for street outreach, emergency shelter and transitional housing, rapid rehousing, and prevention. HOPWA funding is used for housing assistance, permanent housing placement, and support services.

Emergency home repairs (owners)

The Emergency Loan Program provides CDBG funding for repairs to ensure safe conditions for low- and moderate-income owner occupants. Program funds are used to address major deficiencies, including roof replacement, heating, electrical, and plumbing system repairs, and interim controls to alleviate lead-based paint hazards. Funds may also be used for minor repairs to correct a single code violation or hazard. It is anticipated that up to 95 homeowners will be served. Program delivery funding supports the efforts of city staff, the loan administrator, and community-based organizations that deliver housing programs in eligible neighborhoods.

Substantial rehabilitation (owners)

The Owner-Occupied Rehab Program provides HOME funding for the rehabilitation of existing owner-occupied, one- to four-family units, to ensure the availability of decent, safe and affordable housing for extremely low-, very low-, low-, and moderate-income households. Program funds will be used for rehab expenses in targeted neighborhoods, or as matching funds for other targeted programs, including interim controls to alleviate lead-based paint hazards. The city distributes funding through an RFP process. Proposals are rated based on market analysis, cost effectiveness, development team experience and qualifications, M/WBE participation, and the amount of outside funding being leveraged. It is anticipated that up to 20 units will be assisted, although it is difficult to project the exact number of units before proposals are submitted. The RFP process allows the city to prioritize projects that provide the greatest number of housing units for the lowest HOME investment, in order to maximize program benefits.

Substantial rehabilitation (renters)

The Multi-Family Rehab/Construction Program provides HOME funding for the rehabilitation of investor-owned structures (or identified problem properties), or for the construction of new rental units to ensure the availability of decent, safe, and affordable housing for very low-, low-, and moderate-income renters. Program funds will be used for rehab expenses in targeted neighborhoods that bring assisted units into compliance with building codes, including interim controls or abatement to alleviate lead-based paint hazards. The city distributes funding through an RFP process. Proposals are rated based on market

analysis, cost effectiveness, development team experience and qualifications, M/WBE participation, and the amount of outside funding being leveraged. It is anticipated that up to 35 units will be assisted, although it is difficult to project the exact number of units before proposals are submitted. The RFP process allows the city to prioritize projects that provide the greatest number of housing units for the lowest HOME investment, in order to maximize program benefits.

Clearance

The city will use CDBG funding to demolish blighted residential, commercial, and industrial properties in targeted neighborhoods. The city works from a list of vacant properties that have been abandoned and fallen into public ownership, or that were added through a court order to be demolished. Prior to demolition, all properties are approved by the State Historic Preservation Office, and city-owned properties are also reviewed by the Buffalo Preservation Board. The city then prioritizes the list of eligible properties by identifying those that are an imminent threat to the surrounding community. Before demolition begins, the city will attempt to ensure that any salvageable materials are removed for reuse. Structures are tested for asbestos, and abated if necessary. It is anticipated that up to 70 structures will be demolished, although work on commercial and industrial properties often costs significantly more than on residential ones, and thus lowers the ultimate number of demolitions.

Public facilities

Many of the public services provided to youth and seniors take place at city-owned community centers. The city works from a list of repairs that is prepared and maintained by the Department of Public Works. The city has developed a plan that will allow repairs for various community centers to be addressed over the next six program years. Structural repairs such as roofs, walls, and foundations will be taken care of first; followed by plumbing, HVAC, and electrical; and finally interior finishes and fixtures. This will allow the most serious building issues to be addressed before they become larger problems. The city will use CDBG funding to make \$275,000 in improvements to both Manhattan Park and Walden Park, which are located in eligible low- and moderate-income neighborhoods.

Public infrastructure

The Department of Public Works provides an annual list of streets that require resurfacing and sidewalks that require replacement. Based on HUD guidelines, the city conducts a three-part review for each to determine eligibility. The first step is a check to ensure that each segment is located within an eligible low- to moderate-income neighborhood. The second step requires the city to count the individual parcels on both sides of the street, and confirm that at least 51 percent are currently in residential use; not vacant, commercial, industrial, or institutional. The final step takes the estimated cost of resurfacing the street or replacing sidewalks for each segment, and divides it by the total number of residential parcels, to allow the city to rank improvements from most to least cost effective. There are 19 segments on the street resurfacing list and 31 on the sidewalk replacement list; these will be completed as funding allows.

Public services

The city will provide CDBG funding to support 15 non-profits that provide services to youth; 18 non-profits that provide services to seniors; and 11 non-profits that provide a variety of other human service programs to low- and moderate-income households and neighborhoods.

Homeless

The city will distribute ESG funding to assist the homeless and other special needs populations. Applications are submitted to the city, and then reviewed, rated, and recommended for funding by the Continuum of Care steering committee, a group that has been designated by HUD to coordinate homelessness efforts in the region. City representatives sit in on the review panel discussion, but do not rate applications. Street Outreach funding is used to locate homeless persons in shelters, soup kitchens, and on the street; and to secure appropriate services and case management for them. Shelter funding will be directed to five emergency shelter operators and four transitional housing providers for operating expenses and support services. Since persons in poverty are the most susceptible to becoming homeless, prevention funding will be provided to assist tenants facing eviction. The city initiated a Rapid Rehousing Demonstration Project during the current program year to help homeless individuals and families reclaim permanent housing. This effort will be carried forward in this program year, with a Request for Proposals distributed to solicit interest in delivering this service. Finally, the Homeless Alliance of Western New York will receive funding to oversee the HUD-mandated Homeless Management Information System (HMIS).

Persons with HIV/AIDS

The city will distribute HOPWA funding to assist persons with HIV/AIDS and their families in Erie and Niagara counties. Funding will be used for housing assistance, permanent housing placement, and supportive services.

Economic development

The city will use CDBG funding to repay Section 108 loans, and to contract with the New York Business Development Corporation to manage the city's existing portfolio of business loans.

Planning and administration

The City of Buffalo (including the Buffalo Urban Renewal Agency) and Homeless Alliance of WNY will use CDBG, HOME, ESG, and HOPWA funds to administer these programs.

AP-50: GEOGRAPHIC DISTRIBUTION

Geographic areas where assistance will be directed

The city will fund efforts located within HUD-eligible low- and moderate-income block groups; but will focus on neighborhoods and corridors included in the boundaries of the Better Buffalo Fund. The BBF represents a five-year commitment by the state to make capital investments that improve disadvantaged areas and develop community-wide assets. It is designed to support infrastructure, housing, and other development projects that build on anchor institutions and employment centers and have additional funding committed from other sources.

<i>Target Area</i>	<i>Percentage</i>
Black Rock	5
Buffalo Promise Neighborhood	5
Cold Spring	5
Fillmore Leroy	10
Fruit Belt	10
Hamlin Park	5
Lower West Side	5
Masten Park	5
Perry Choice Neighborhood	5
Pratt Willert	5
West Side	10
Other HUD-eligible block groups	30

Rationale for allocating investments geographically

In order to generate the greatest impacts from declining entitlement funds, the city will focus efforts on neighborhoods that exhibit the following characteristics:

- Are near emerging employment and economic development engines that can serve as a stabilizing influence;
- Have developed a cohesive network of community-based and institutional support; and

- Have secured and leveraged funding to support their efforts.

Targeting and leveraging entitlement funding represents the best opportunity to accomplish the city's community development goals; and the Better Buffalo Fund represents the single greatest source of supplemental funding for these projects.

AP-55: AFFORDABLE HOUSING

The city will provide affordable housing to the homeless, non-homeless, and special needs populations through rental assistance, the construction of new housing units, and the rehabilitation of existing units.

Affordable Housing Goals by Household Type

Total	520
Homeless	65
Non-Homeless	150
Special-Needs	305

Affordable Housing Goals by Support Type

Total	520
Rental Assistance	370
Production of New Units	20
Rehab of Existing Units	130
Acquisition of Existing Units	0

AP-60: PUBLIC HOUSING

The city will address the needs of its public housing and encourage residents to become more involved in its management and homeownership.

Actions planned during the next year to address public housing needs

The Buffalo Municipal Housing Authority operates approximately 3,940 units in 27 developments. It meets the needs of its tenants through regular physical, operational, and management improvements, which are listed in its annually updated Five-Year Agency Plan.

BMHA is engaged in efforts to improve its housing stock and the overall living environment for its residents by creating mixed-income communities and alleviating concentrated poverty. The Perry Choice Neighborhood program is an example of this approach. The project has successfully concluded its planning phase, and applied for a \$30 million implementation grant under the Choice Neighborhoods program. Its initial application was not selected for funding, but BMHA intends to reapply for this grant.

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

BMHA's Resident Services Division works to engage, educate, and empower residents by providing opportunities for personal development, economic stability, education, health, and fostering family and community life. The Division organizes resident councils at each development, as well as a citywide council; assists the Resident Advisory Board in its mission to review and comment on BMHA's Annual Plan; educates and consults with the Resident Review Board regarding applicants; and helps to establish and educate residents regarding disaster preparedness through BMHA Citizen Corps.

BMHA also conducts annual resident information meetings at each of its developments. These meetings are designed to inform residents of current and future plans such as lease changes, modernization projects, human resource programs, and available training.

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

NA

AP-65: HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES

The city will support street outreach, emergency shelter and transitional housing, prevention, and rapid rehousing to assist the homeless and other special needs populations.

Describe actions to reach out to homeless persons (especially unsheltered persons) and assess their individual needs

The outreach strategy promoted by the Homeless Alliance is to simplify and broaden efforts to assist more clients in receiving benefits and services. The city will provide funding to the Matt Urban Center to support efforts to locate homeless persons in shelters, soup kitchens, and on the street; and link these persons with appropriate services and case management.

Describe actions to address the emergency shelter and transitional housing needs of homeless persons

The supply of emergency and transitional housing beds was recently increased by 50 units with the opening of Hope House in June, and will add another 20 units at Hope Gardens by fall. With implementation of the HEARTH Act, the Homeless Alliance will be developing a coordinated entry system using a common assessment form. This will ensure that placements are made based on the needs of the homeless individual or family, rather than on where there might be an empty bed. The city will provide ESG funding to five emergency shelters – City Mission, Compass House, Hope House, Salvation Army, and Vive; and four transitional housing providers – Gerard Place, Saving Grace Ministries, Teaching and Restoring Youth, and YWCA, for operating expenses and support services.

Describe actions to help 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 lack of permanent, affordable housing is the largest gap faced by persons experiencing homelessness as well as the low-income community in general. The strategy being pursued to ensure that homeless individuals make the transition to permanent housing and independent living is prioritizing safe and stable housing and making affordable housing options more accessible to homeless individuals. The city is about to conclude its Rapid Rehousing Demonstration Project to help homeless individuals and families to reclaim permanent housing. This effort will be carried forward with ESG funding in the current program year.

Describe actions to help 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

Since persons in poverty are the most susceptible to becoming homeless, reducing financial vulnerability is the key to helping low-income families and individuals from becoming homeless. The city will provide ESG funding to Neighborhood Legal Services to help tenants avoid eviction.

AP-70: HOPWA GOALS

The city will use HOPWA funding to assist individuals and families who are either HIV-positive or living with AIDS. The need for these services has been increasing along with the number of HIV-positive individuals. There are an estimated 2,300 persons in Erie and Niagara counties who are known to be HIV-positive, and the Centers for Disease Control and Prevention estimates that up to 600 more are undiagnosed. Although most are single men and women, a growing number are single mothers with young children.

The trends that the city will face in the coming years are based on the facts that the AIDS/HIV virus continues to spread, and up to 27 percent of persons with AIDS/HIV are unaware that they are infected. There is an obvious need for further education and testing. The city will encourage sub-recipients to increase their efforts to educate the community about the services available for persons with HIV/AIDS, and to attempt to ensure that every person in need of services is linked to the appropriate provider.

Affordable housing remains a critical issue in stabilizing the health of persons with HIV/AIDS. In a survey conducted by the AIDS Network of WNY, 23 percent of the respondents had spent time on the streets or in an emergency shelter. The city directs ESG funding to a number of emergency shelters, which in turn serve many persons with HIV/AIDS.

The city will provide HOPWA funds to Benedict House, Evergreen Health Services, and the Red Cross to deliver housing assistance, permanent housing placement, and supportive services. These sub-recipients will leverage over \$3.3 million in additional funding from a range of private and public sources, including in-kind contributions.

HOPWA funding will allow these agencies to assist 305 persons, including 75 through short-term rent, mortgage, or utility support; 40 with tenant-based rental assistance; 75 through permanent housing placement (first month's rent, security and utility deposits); and 115 with supportive services that include housing.

Households assisted

Total	190
Short-term rent, mortgage, utility assistance	75
Tenant-based rental assistance	40
Units in permanent housing facilities operated with HOPWA funds	75
Units in transitional housing facilities operated with HOPWA funds	0

AP-75: BARRIERS TO AFFORDABLE HOUSING

The city will act to address barriers to affordable housing by updating its land use and zoning, participating in a regional land bank, investigating the impacts of fees and charges, and implementing its Analysis of Impediments study.

Actions 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.

Land Use and Zoning

The city's zoning code was developed in the early 1950s, based on a popular model at the time that sought to separate different uses – residential, commercial, employment – with the car as a means of travelling among them. This attempt to compete with the expanding suburbs has proven largely unsuccessful, and features such as large residential lot requirements and prohibitions against mixed-use developments have made housing more costly and difficult to build. The city's 2006 Comprehensive Plan embraced smart growth as a means of focusing revitalization and redevelopment in its existing neighborhoods. This effort to reverse decades of city abandonment and suburban sprawl depends upon key investments of federal, state, and local funds to restore livability, economic potential, and social cohesion in targeted neighborhoods. Central to this strategy is the proposed Green Code – an updated land use plan and zoning ordinance that will be adopted in 2015, and support the development of walkable, mixed-use neighborhoods built on an urban scale.

Land Banking

The demolition of thousands of abandoned and deteriorated buildings has created many vacant lots that could be used to develop affordable housing and neighborhood amenities. Blueprint Buffalo, a 2004 plan for reclaiming vacant properties, identified a land bank as the ideal entity to transform vacant properties into assets. While the city has engaged in informal land banking activities for many years, the Buffalo, Erie, Niagara Land Improvement Corporation was created in May 2012 in response to the state's approval of land bank legislation. Through this corporation, the city will be able to work regionally to address vacant properties.

Fees and Charges

The city has employed state guidelines in its Soils Policy in order to address environmental toxicity standards and soil contamination of lots being used in its development and grant assistance programs. This policy requires removal of two feet of soil, installation of a permeable environmental fabric, and restoration of imported, certified soil. The cost of implementing this policy ranges from \$20,000 to \$40,000 per buildable lot. While this is a significant cost, it ensures that decades of environmental hazards are rectified and subsequent housing development is safe for its occupants.

The city conducts an asbestos survey on each structure to be demolished. For those identified as containing asbestos, the state imposes an asbestos fee on each unit to be readied for demolition. This fee adds several thousand dollars to the cost of demolishing a structure, with no additional benefit. Removal of the fee would allow the city to greatly expand the number of abandoned and deteriorated structures that it can demolish for the available funding. Efforts to lobby the state to remove this fee, in conjunction with other municipalities that are similarly affected, have been unsuccessful to date.

Analysis of Impediments

The city's updated *Analysis of Impediments to Fair Housing Choice* outlined additional barriers to affordable housing, including the poor condition of the existing housing stock; declining availability of affordable rental units; concentration of voucher holders; lack of transit connections; persistence of housing discrimination; and growing needs among the non-English speaking population.

The city will be implementing the action steps to address these concerns over the course of the next five years. The city has also agreed to participate in a regional Analysis of Impediments as part of the HUD Sustainable Communities Initiative, which will address desegregation and access to opportunity within Erie and Niagara counties.

AP-85: OTHER ACTIONS

The city will take other actions to address obstacles to underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination among agencies.

Actions planned to address obstacles to meeting underserved needs

The greatest obstacle that the city faces remains the limited community development dollars available from federal, state, local, and private sources. The overwhelming needs in Buffalo make it impossible to address everything that city leaders would like to improve. In response, the city has taken two approaches. The first is to target investments geographically to areas that can best benefit from an infusion of public support. The second is to be proactive in leveraging dollars and combining funds from various sources in order to achieve project goals. These approaches will continue, and be linked to the state's Better Buffalo Fund to ensure success.

Actions planned to foster and maintain affordable housing

The city has embraced smart growth as an approach for focusing revitalization and redevelopment in its existing neighborhoods. This ongoing effort to reverse decades of urban abandonment and suburban sprawl depends upon key investments of CDBG, HOME, state, and local funds to restore livability, economic potential, and social cohesion in targeted neighborhoods.

Central to this strategy is the Green Code – an updated land use plan and zoning ordinance for the entire city that is currently wrapping up. The goal is to use land use planning to support affordable housing by encouraging the development of dense, walkable neighborhoods with access to goods, services, and public transportation. Zoning is also a critical element in the provision of affordable housing, by removing barriers such as minimum lot sizes and prohibitions against mixed-use development that unnecessarily add to costs.

Actions planned to reduce lead-based paint hazards

LBP hazards are very extensive across Buffalo. Roughly 95 percent of the city's housing stock was constructed before 1980, so most housing units have the potential for LBP hazards. A 2006 report indicated that one-third of all lead-based poisoning cases in the state originated in six Buffalo zip codes, with about 300 cases identified annually.

The city does not have the resources to address all LBP hazards, so efforts are targeted in the most-affected areas through the Green and Healthy Homes Initiative. This is a collaborative effort to bring together organizations to combat LBP hazards, asthma-related issues, and provide weatherization for lower-income families. Various funding sources have been identified, including the Community Foundation of Greater Buffalo, the Attorney General's Office, and HUD.

GHHI is concentrated in the six zip codes mentioned above. Every year a four- to six-block area within each zip code is selected for concentrated inspections. About 900 units receive exterior assessments, and

300 of these units where a child is present will also receive interior inspections. While this effort does not include inspections of every home with the potential for LBP hazards, areas with the highest concentration of elevated blood lead level cases are being inspected regularly.

The city recently passed legislation to allow LBP hazards to be cited as a violation, and coordination between the city and the county allow housing and health code violations to be cited simultaneously. The city also requires that all of its rehabilitated units are lead-safe, and provides funding to CHDOs and CBOs for lead-hazard remediation and toxic soil removal.

Actions planned to reduce the number of poverty-level families

Federal, state, and regional policies on welfare, health care, housing choice, transportation, and the minimum wage are all critical components in reducing poverty. While the city has little control over these factors, it will continue to assist in this effort by providing incentives to retain, expand, and attract business; to advocate for affordable housing and public transportation; and to support organizations and programs that provide job training, literacy, and placement services.

Actions planned to develop institutional structure

The city is continuing to adjust to the recent shift of program administration from the Buffalo Urban Renewal Agency. While this has required a tremendous amount of work in setting up systems, it also offers an opportunity to revisit past practices and make improvements moving forward. The city revised its application for CDBG, ESG, and HOPWA funding during the current program year; and will make adjustments to encourage more coordination of services among non-profits in the coming program year.

BURA staff will continue to assist the city in administering its entitlement programs; and the city has established a relationship with the New York State Business Development Corporation to administer its CDBG loan portfolio.

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

Four of the six CBOs that receive funding for housing programs also provide social services: Fillmore-Leroy Area Residents, Matt Urban Center, Old First Ward Community Association, and University Heights Community Development Association. Given the on-going reductions in funding, consolidating overhead and management expenses in this manner appears to be a trend that will continue to grow. The city will also aggressively encourage public service agencies to work collaboratively in addressing the broader range of needs that families looking for assistance may need to begin the journey out of poverty.

AP-90: PROGRAM SPECIFIC REQUIREMENTS

The city has prepared program specific requirements for the use of CDBG program income, HOME resale and recapture, and ESG performance standards.

Community Development Block Grant

Projects planned with CDBG funds expected to be available during the year are identified in AP-35. The following identifies program income that is available for use that is included in projects to be carried out.

Total Program Income	\$1,450,000
Amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$1,450,000
Amount of proceeds from Section 108 loan guarantees that will be used during the year to address priority needs and specific objectives	\$0
Amount of surplus funds from urban renewal settlements	\$0
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
Amount of income from float-funded activities	\$0

Home Investment Partnerships

Describe other forms of investment being used beyond those identified in Section 92.205

The city uses no other form of investment beyond those identified in Section 92.205. Under 92.205, a participating jurisdiction may invest HOME funds as equity investments, interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies consistent with the purposes of the HOME program, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of the program. Each participating jurisdiction has the right to establish the terms of assistance, subject to the requirements of this part. The city generally invests HOME funds as interest-bearing loans or advances, non-interest-bearing loans or advances, deferred payment loans, or conditional grants.

Describe the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities

The city has two options for controlling the resale of homebuyer property during the affordability period: the "Recapture Option" and the "Resale Option." The Recapture Option is based on the level of primary lender financing that the homebuyer is able to obtain, or the need for closing cost assistance. The following guidelines apply:

The option will be used whenever a development subsidy has been provided to a developer, CHDO, or other qualified entity for the construction of affordable housing; and

A homebuyer is unable to obtain sufficient financing through a private lender or other approved subsidy source for the full amount of the listed fair market purchase price. A direct subsidy will be provided as gap financing up to the limits described in the HOME Agreement with the project developer; or

A homebuyer has obtained sufficient financing through a private lender or other approved subsidy source for the full amount of the listed fair market purchase price, but does not have sufficient resources to fund the closing costs associated with the purchase. A direct subsidy up to \$5,000 will be provided to finance reasonable and necessary costs, including but not limited to costs to process and settle the financing for purchase of the home, such as private lender origination fees, credit report fees, fees for title evidence, fees for recordation and filing of legal documents, attorney's fees, and private appraisal fees.

In the event that it is determined to be appropriate to use the Resale Option, the city will submit proposed resale terms consistent with the HOME regulations to the local HUD Office, and seek authorization to proceed.

The Recapture Option is used to collect all or a portion of the HOME subsidy in the event the recipient decides to sell the property within the affordability period, or to otherwise violate the affordability provisions of the owner's agreement. The homebuyer may sell the property to any willing buyer, but the sale of the property during the affordability period triggers the repayment of the direct HOME subsidy. In the event that the proceeds from the sale are less than the repayment amount due, the homebuyer must petition the city to accept partial repayment. If sufficient documentation is presented to verify that the net proceeds are insufficient to repay the HOME investment as required, the amount to be repaid will be reduced.

All entities that receive HOME funding for the creation of affordable homebuyer housing – including developers, CHDOs, and Community Based Organizations – will use these recapture provisions.

If a purchaser receives funding under the HOME program for a direct subsidy to support the purchase a HOME-assisted property, the full amount of the direct subsidy assistance provided is due and payable if the property is sold during the period of affordability.

Describe the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds

See above – only the Recapture Option is used.

Describe plans for using HOME funds to refinance existing debt secured by multi-family housing that is rehabilitated with HOME funds, along with a description of the refinancing guidelines required that will be used

No existing debt will be refinanced with HOME funds.

Emergency Solutions Grant

Include written standards for providing ESG assistance

The Homeless Alliance is working to create coordinated assessment tools, policies, and procedures for clients to access services more efficiently. The following standards are being developed:

Eligibility: Planning is currently underway to develop a coordinated entry system for homeless services that will include the design of a common assessment form. The model will eventually determine the most efficient and effective means of access to all homeless programs. Regardless of how a family or individual makes contact for assistance, a common assessment form should be used to determine the initial eligibility of the client. If the client is eligible, a follow-up assessment may be conducted to confirm eligibility and formally initiate assistance with the appropriate agency. Once a household or individual is qualified to receive assistance, they will be referred to a case manager for consultation and evaluation to determine the type of assistance or services needed to become stably housed. Case managers will be responsible for entering information into HMIS.

Street Outreach: Outreach programs focus primarily on placing chronically homeless persons into emergency shelters or transitional housing, in an effort to reduce the number of individuals who are living on the streets. Case managers coordinate services and make placements in drop-in centers, safe havens, soup kitchens, stabilization beds, and shelters. Many of these placements also provide homeless individuals with meals, counseling, medical and psychiatric services, showers, laundry facilities, clothing, employment referrals, assistance in applying for benefits, and other social services. All persons who accept assistance are entered into HMIS, and their progress tracked by case managers.

Emergency Shelter: The city is currently working with the Homeless Alliance to establish performance standards for emergency shelters and transitional housing providers that will seek to reduce the average length of stay in these facilities, and increase exits to permanent housing. HMIS data will be used to identify current performance and establish a baseline for each metric. Shelter providers will be engaged regarding benchmarks for goals and expected outcomes, which will become part of their contracts. The common assessment form being developed will be used to assess, prioritize, and reassess individuals' and families' needs for essential services related to emergency shelter. Agencies providing this service are required to have written policies and procedures for admission, diversion, referral, and discharge that have been approved by the city.

Rapid Re-housing: The common assessment tool will be used at the initial intake to determine both eligibility and the type of assistance applicants will receive. Program participants will be required to pay a portion of their household income for rent and utilities while receiving rapid re-housing assistance. The majority of households in the rapid rehousing program will receive financial assistance for three to six months, and average around \$2,000. Case managers working with applicants will develop a housing plan for each program participant. These plans will include the elements participants will need in order to be stably housed when the program term concludes. Housing plans will also include benchmarks and goals that participants must achieve.

Describe the centralized or coordinated assessment system established by the Continuum of Care

The Homeless Alliance is currently developing a coordinated assessment system that will be in place during the upcoming program year.

Identify the process for making sub-awards and describe how the ESG allocation is available to non-profit organizations

All ESG program funding is distributed to non-profit organizations that provide services to the homeless. Organizations apply for ESG funding using an application that assembles information on the type of services performed, the target population, and the amount of funding requested. Applications are reviewed and rated by the Continuum of Care Review Committee, which also provides funding recommendations to the city.

Specify the 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

The city uses the Homeless Alliance's Continuum of Care Review Committee to assess and rate applications for ESG funding. This committee includes a formerly homeless person. The Homeless Alliance is frequently consulted regarding program issues and decisions.

Describe performance standards for evaluating ESG

In 2010, the Homeless Alliance initiated a detailed analysis to develop new outcome measures and benchmarks for homeless programs. Since then, work has continued on evaluating outcomes and developing benchmarks for the homeless population. The emphasis on improving the quality of data collection to reduce the number of "unknown" outcomes system-wide was clearly identified.

The HEARTH Act's emphasis on rapid re-housing brings the opportunity for new programming to accompany the new funding. As there is not a significant history of rapid re-housing activity, the city will be developing a set of performance standards that all service providers will be expected to meet.

The following preliminary performance standards were developed after consultation with the Homeless Alliance:

- Reduce the number of persons entering homeless shelters.
- Reduce the number of persons returning to homelessness.
- Access mainstream income resources.
- Return 65 percent of participants to permanent housing.
- Stably house 75 percent of participants for at least six months after exiting the program.
- Reduce the length of shelter stays to less than 20 days, or by 10 percent of the current length of stay.