

Revisions herein meet the criteria for Substantial Amendments described in the City of Dunkirk’s CDBG Citizen Participation Plan, namely the change in the scope of any project such that there is a 20% increase or decrease in the amount of money allocated to the project.

Expected Resources

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

Introduction

Allocation announcements from HUD were made in early April of 2019. The City of Dunkirk was awarded \$474,831 for the 2019 program year, a \$6033 decrease over funding for the 2018 program year.

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	474,831	0	0	474,831	486,897	We assume that CDBG funding will be consistent for the next three programs years. In reality, there is a strong likelihood that annual funding could vary.

Table 1 - Expected Resources – Priority Table

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

The City's Planning and Development Department is constantly looking for grant opportunities to improve our community. Where appropriate, we will make every effort to utilize CDBG funding to leverage additional funding for projects. For instance, in 2019 we are looking to apply for additional housing rehabilitation funding through New York State's Affordable Housing Corporation, and will attempt to leverage the CDBG funding we are intending to allocate for this activity. This could be an additional source of housing funding for future program years.

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

The desire for additional recreation opportunities has been identified as a need in our community and the City is utilizing some City-owned land to address this need. For instance, we are currently undergoing a major improvement project to the City-owned Pier to increase waterfront access, create a more pedestrian friendly space, and to increase recreational opportunities on this formerly blighted parking lot. In addition, the City plans to acquire the land adjacent to the Animal Shelter to create the new Dunkirk Dog Park.

Discussion

Our community is one with high levels of need relative to available resources. We are keenly aware of this fact. Keeping this fact in mind, we will strive to spend available CDBG funds effectively and when possible will leverage additional funds with our CDBG award.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Table 2: Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Safe, Affordable Housing	2018	2020	Affordable Housing Homeless	DUNKIRK	Quality, Affordable Housing	CDBG: \$139,000	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 6 Household Housing Unit Direct Financial Assistance to Homebuyers: 8 Households Assisted
2	Improve Infrastructure / Pedestrian Infrastructure	2018	2020	Non-Housing Community Development	DUNKIRK	Infrastructure / Pedestrian Infrastructure	CDBG: \$268,830	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Improve Community Outreach	2018	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	DUNKIRK	Expanded Community Outreach	CDBG: \$37,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Provide Education Programming for Students	2018	2020	Public Services for Youth	DUNKIRK	Children's Education / After School Programs	CDBG: \$30,000	Public service activities other than Low/Moderate Income Housing Benefit: 70 Persons Assisted
5	Creative Economic Development Solutions	2018	2020	Economic Development	DUNKIRK	Small Business Loan Program	CDBG: Previously allocated funding	Economic Development activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted

Table 3: Goal Descriptions

1	Goal Name	Provide Safe, Affordable Housing
	Goal Description	<p>This program year we will look to provide safe, affordable housing to our community by funding three activities:</p> <ul style="list-style-type: none"> • CHRIC Closing Cost and Down Payment Assistance Program • CHRIC Roof Repair Program • CHRIC Acquisition/Rehab/Resale Program
2	Goal Name	Improve Infrastructure/Pedestrian Infrastructure
	Goal Description	<p>This program year we will create a more pedestrian friendly community by funding four activities:</p> <ul style="list-style-type: none"> • Dunkirk’s Pier Improvements Project: This will allow for increased fishing, water recreation, access to the waterfront, better connected waterfront trails and will not only reduce a blighted parking lot, but will also allow for greater access and a more pedestrian friendly environment for all Dunkirk residents. • Dunkirk Historical Museum Renovations • Adam’s Art Center • Dog Park Acquisition
3	Goal Name	Improve Community Outreach
	Goal Description	<p>This program year we will address community outreach by helping fund programming for two activities:</p> <ul style="list-style-type: none"> • Bilingual HOPE Center • Salvation Army Food Pantry

4	Goal Name	Provide Education Programming for Students
	Goal Description	<p>This program year we will address the goal of providing education programming for students by funding two activities:</p> <ul style="list-style-type: none"> • Boys and Girls Club of Northern Chautauqua County Bridging the Gap Program • Chautauqua Striders After School Program
5	Goal Name	Creative Economic Development Solutions
	Goal Description	This program year we are aiming to reactivate a small business loan program that has existing funding through the CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

Our selection of projects for the 2019 CDBG program year reflects our best attempt to address the needs determined to be the highest priority in our community. The total amount of funding requested from CDBG applicants far outweighed our anticipated funding. Our application pool was strong, and included submittals from organizations that the City regularly partners with as well as organizations making their first submittals.

Applications were made available beginning on March 18, 2019. Notices of the application's availability were published in the local newspaper and on the City's website. Additionally, emails were sent out to organizations who have applied in the past or to those who requested to be notified when applications were available. The application window closed on May 3, 2019. The City received 17 applications totaling over \$1,190,000.

Applications were reviewed at the staff level for program eligibility and then, following the procedure described in our Citizen Participation Plan, evaluated by a team consisting of the CDBG Administrator, the Director of Development, and the Mayor.

Projects

Table 2 - Project Information

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

Our allocation priorities were decided a number of factors, including:

- Level of need for proposed
- Expected timeliness in spending
- Past history with subrecipients
- Measurability of outcomes
- Number of people served

#	Project Name
1	Owner-Occupied Roof Repair
2	Down Payment and Closing Cost Assistance
3	Rental Based Rehabilitation Program
4	Pier Improvements
5	Dunkirk Historical Museum
6	Adams Art Center
7	Dog Park Acquisition
8	Program Administration
9	HOPE Center for Community Services
10	Salvation Army Food Pantry
11	Chautauqua Striders Dunkirk Programs
12	Boys & Girls Club After School Programs

based on
activity

We acknowledge that there is an imperfect match between our selected projects for 2019 and the needs/goals identified in the Comprehensive Plan. That being said, we have done our best to balance

the factors listed above in selecting projects.

Obstacles to addressing underserved needs include:

- Availability of funding
- The limited number of potential subrecipients in the Dunkirk area to assist with projects/programs
- Insufficient data on some populations, including homeless
- Lacking public participation in the planning process

Where possible, we will continue working to improve these underserved needs.

AP-38 Project Summary
Project Summary Information

1	Project Name	Owner-Occupied Roof Repair
	Target Area	DUNKIRK
	Goals Supported	Provide Safe, Affordable Housing
	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$64,000
	Description	Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC) will assist at least 6 low- or moderate-income homeowners with roof repairs.
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	At least six low- or moderate-income Dunkirk households will benefit from this program.
	Location Description	The location of the proposed households is yet to be determined but will be based on CHRIC's existing waiting list of addresses for roof repair services and city approval of the list.
Planned Activities	According to CHRIC, only roof repairs will be eligible for this program. Repairs may be undertaken to as much of the roof as necessary to assure that the roof is weather-tight and will remain weather-tight for a minimum of 20 years. Where the existing roof has failed, a full tear-off will be undertaken, failed sheathing will be replaced as necessary and new roofing materials will be installed. If the existing gutters are in good condition, they will be re-hung. Otherwise, new gutters will be included in the scope of work when it is bid. Soffits and fascias will not be addressed under this program. Repairs/replacements may be undertaken on the entire roof or to only a portion as existing conditions dictate.	
2	Project Name	Down Payment and Closing Cost Assistance
	Target Area	DUNKIRK
	Goals Supported	Provide Safe, Affordable Housing
	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$35,000

	Description	Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC) will assist 8 low- to moderate-income individuals/families with down payment and/or closing cost assistance for the purchase of a home in the City of Dunkirk.
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	CHRIC will assist 8 low-to-moderate income individuals or families with this program
	Location Description	The locations of the proposed homes are yet to be determined.
	Planned Activities	Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC) will assist 8 individuals/families with down payment and/or closing cost assistance for the purchase of a home in the City of Dunkirk. Assistance will be provided to first time homebuyers who have incomes at or below 80% of the area median income.
3	Project Name	Acquisition/Rehab/Resale Program
	Target Area	DUNKIRK
	Goals Supported	Provide Safe, Affordable Housing
	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$40,000
	Description	Chautauqua Home Improvement and Rehabilitation Corp. (CHRIC) will acquire 1 foreclosed or Land Bank-owned property, rehabilitate it, and sell it to a first-time homebuyer.
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	One low-income family will benefit from this activity
	Location Description	The location of this project has yet to be determined

	Planned Activities	CHRIC's Executive Director will work with the Chautauqua County Land Bank to purchase a property from the County tax foreclosure auction, or alternatively will utilize a Land Bank-owned property. The Project Manager for the project will perform a lead based paint risk inspection, write a scope of work, have contractors bid on the project, perform site visits, and ensure that all necessary permits are filed. CHRIC's Homeownership Program Manager will have a first-time homebuyer ready to purchase the home once it has been rehabilitated, and will guide that client through the purchase process.
4	Project Name	Pier Improvements
	Target Area	DUNKIRK
	Goals Supported	Improve Infrastructure / Pedestrian Infrastructure
	Needs Addressed	Reduce blighted parking lot and Increase pedestrian friendly access to waterfront for fishing and water recreation
	Funding	CDBG: \$108,864
	Description	Funding will be leveraged with other resources to rebuild, shore up, repave, and modernize Dunkirk's Pier
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	13,000 residents of the City of Dunkirk will benefit from this project. Over 51% of the City are low-moderate income families
	Location Description	Central Ave. at Lake Shore Drive
Planned Activities	Paving, landscaping, lighting, seating	
5	Project Name	Dunkirk Historical Museum Renovations
	Target Area	DUNKIRK
	Goals Supported	Improve Infrastructure / Pedestrian Infrastructure – Public Facility
	Needs Addressed	Historical Preservation
	Funding	CDBG: \$30,000
	Description	Funding will be used for necessary museum building repairs for safety
	Target Date	9/1/2019

	Estimate the number and type of families that will benefit from the proposed activities	13,000 residents of the City of Dunkirk will benefit from this project. Over 51% of the City are low-moderate income families
	Location Description	513 Washington Ave., Dunkirk
	Planned Activities	Masonry, electrical upgrades, window repairs
6	Project Name	Adams Center for Collaborative Design
	Target Area	DUNKIRK
	Goals Supported	Infrastructure / Public Infrastructure (Public Facility)
	Needs Addressed	Cultural Opportunities
	Funding	CDBG: \$35,000
	Description	Provide funding to repair the failing roof or other rehabilitation of the future Adams Center for Collaborative Design.
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	Once the Adams Center for Collaborative Design is open to the public, we anticipate that hundreds of Dunkirk families will benefit from its activities.
	Location Description	600 Central Avenue
	Planned Activities	Funds will be utilized to stabilize the failing roof of the former Adams Art Gallery.
7	Project Name	Dog Park Acquisition
	Target Area	DUNKIRK
	Goal Supported	Infrastructure / Public Infrastructure (Public Facility)
	Needs Addressed	Recreation
	Funding	This project will use \$34,089 of previously allocated CDBG funding
	Description	To acquire the vacant property in the low-income neighborhood adjacent to the new animal shelter to create an entire animal sanctuary by developing a dog park.

	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12,563 residents of the City of Dunkirk will enjoy this new park
	Location Description	855 Main Street Extension
	Planned Activities	Purchase property
8	Project Name	Administration and Planning
	Target Area	DUNKIRK
	Goals Supported	Administration and Planning of CDBG activities
	Needs Addressed	Community Development
	Funding	CDBG: \$94,966
	Description	Administrative Salaries and costs associated with NRG Feasibility Study
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	13,000 residents of the City
	Location Description	City Hall and former NRG Power Plant site
	Planned Activities	Funds will be used for CDBG Program Administrator and CDBG Secretary Salaries along with conducting a feasibility study for the former NRG Power Plant location
9	Project Name	HOPE Center for Community Services
	Target Area	DUNKIRK
	Goals Supported	Improve Community Outreach
	Needs Addressed	Expanded Community Outreach
	Funding	CDBG: \$30,000
	Description	Funding will be used to rehabilitate the Hispanic Organized for Progress and Education (HOPE) Center and for programming costs, out of which bilingual public services will be offered.

	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	We anticipate that 100 low- to moderate-income families benefit from this project.
	Location Description	Corner of Wright and Main Streets
	Planned Activities	Projects funds will be used to rehabilitate the new space for HOPE and for staffing and programming costs to provide outreach services to the community, with a focus on Dunkirk's Hispanic community.
10	Project Name	Salvation Army Food Pantry
	Target Area	DUNKIRK
	Goals Supported	Improve Community Outreach
	Needs Addressed	Expanded Community Outreach
	Funding	CDBG: \$7,000
	Description	Funding will be used for program support staff salaries to run the Food Pantry Program
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	We hope that 100 low- to moderate-income families benefit from this project.
	Location Description	704 Central Ave.
	Planned Activities	Projects funds will be used to pay 1 – PTE to staff the program
11	Project Name	Chautauqua Striders Dunkirk Programs
	Target Area	DUNKIRK
	Goals Supported	Provide Education Programming for Students
	Needs Addressed	Children's Education/After School Programs
	Funding	CDBG: \$15,000

	Description	CDBG funds will be used to supplement, sustain and increase Community Based Tutoring for Dunkirk students in grades 3 – 5.
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 20 low-income students will benefit from this programming.
	Location Description	Activities will occur at Chautauqua Striders facilities on Lake Shore Drive East and at Dunkirk Public Schools.
	Planned Activities	<ul style="list-style-type: none"> • Academic tutoring and mentoring for kindergarten through high school students • Mentoring program that pairs Dunkirk students with local professionals to provide guidance and support • Life Skills Education programming at elementary and middle schools that focus on communication skills, anger management, self control, self esteem, bullying, healthy living, and other skills that assist students in achieving personal and academic success <p>Strides 4 STEAM program that encourages girls enrolled in Dunkirk middle school to pursue careers in Science, Technology, Engineering, Arts and Math</p>
12	Project Name	Boys & Girls Club Bridging the Gap
	Target Area	DUNKIRK
	Goals Supported	Provide Education Programming
	Needs Addressed	Children’s Education / After School Programs
	Funding	CDBG: \$15,000
	Description	Education and career program focusing on academic enrichment, mentoring, and career development needs of low-income children and teens.
	Target Date	9/1/2019

	Estimate the number and type of families that will benefit from the proposed activities	50 low/moderate income children and teens.
	Location Description	704 Central Avenue
	Planned Activities	Funds will be utilized for program staff and supplies to support: <ul style="list-style-type: none"> • Job Reach! Career enrichment program supporting teens • Kid Litz and Math Blitz reading and math programs • Power Hour Tutoring program for struggling in-school youth and out-of-school youth to obtain their High School Equivalent
13	Project Name	Small Business Loan Program
	Target Area	DUNKIRK
	Goals Supported	Economic Development
	Needs Addressed	Creative Economic Development Solutions
	Funding	Prior CDBG funds
	Description	Small Business Loan Program to provide loan funds to startup or expansion companies within the city limits of the City of Dunkirk to create new jobs and employ low/moderate income persons
	Target Date	9/1/2019
	Estimate the number and type of families that will benefit from the proposed activities	The goal is to create 10 new low/moderate income jobs.
	Location Description	704 Central Avenue
	Planned Activities	Funds will be used to provide loans to small businesses who intend to open or expand within the City and employ low/moderate income persons. These funds may be used for a variety of activities including: Building construction, renovation, purchase or improvements. To purchase capital equipment to conduct or expand, inventory for start-ups, or general operating capital.

AP-50 Geographic Distribution – 91.220(f)

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

For the 2019 program year, CDBG assistance will be directed to those areas of the City that demonstrate the highest levels of need. These neighborhoods are concentrated near downtown and/or along the Main St. corridor. Programs targeted to these areas include a Pier Improvement, housing rehabilitation, HOPE Center for bilingual outreach services, and improvements to the former Adams Art Gallery.

Geographic Distribution

Target Area	Percentage of Funds
DUNKIRK	100

Table 3 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Our rationale for directing assistance to these neediest areas is two-fold. First, it represents our best attempt to address the needs outlined in the Plan exactly where it is most needed. This aligns with the CDBG program objective of benefitting low-to-moderate incomes persons, who make up the majority of households in these neighborhoods. Second, it reflects where CDBG applicants have applied for their projects to occur. Our choice in where to distribute projects is constrained in part by the location of projects that have been submitted by applicants.

Discussion

Although directing program funds to the areas of Dunkirk that demonstrate the highest levels of need will always be justifiable, we also strive to be strategic in how exactly funds are distributed geographically. For instance, because many Dunkirk residents have limited transportation options, especially low-income residents, locating a facility to provide assistance to low-income residents near where these residents live makes a lot of sense.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

As demonstrated elsewhere in our Consolidated Plan, there is a strong need in Dunkirk for additional affordable housing options. Through the programs applied for through our CDBG process, we hope to continue tackling the issue of affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	15
Special-Needs	0
Total	15

Table 4 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	6
Acquisition of Existing Units	8
Total	15

Table 5 - One Year Goals for Affordable Housing by Support Type

Discussion

The programs that will help us reach these one year goals for affordable housing include:

- Chautauqua Housing Rehabilitation and Improvement Corp's (CHRIC) Acquisition/Rehab/Resale Program
- CHRIC'S Down Payment and Closing Cost Assistance Program
- CHRIC's Roof Repair Program

While we recognize that the number of households helped by these programs is a drop in the bucket relative to the need for affordable housing in our community, these programs will make a meaningful impact in the lives of the households assisted. We hope that they can be a catalyst for additional improvements going forward.

AP-60 Public Housing – 91.220(h)

Introduction

The Dunkirk Housing Authority (DHA) provides a valuable supply of affordable housing options in our community. In the upcoming program year, we will look for ways to support and partner with the DHA and its residents.

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

Our consultation process in preparing this plan suggests that public housing needs are less urgent than other housing needs in the community. The DHA, while acknowledging that some ongoing issues do exist, has conveyed that public housing in Dunkirk is in stable condition. With this in mind, we feel that other more pressing housing needs should be the focus of our efforts.

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

We will continue working with local organizations including the DHA, Chautauqua Opportunities, Inc. (COI), and Chautauqua Home Rehabilitation and Improvement Corps (CHRIC) to make public housing residents aware of available housing programs. We also recognize that the majority of public housing residents in Dunkirk are Hispanic. In the next year we intend to fund activities aimed at providing more engagement with and resources to our community's Hispanic population. We will be sure to include the DHA and its residents in any of this outreach.

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

The Dunkirk Housing Authority is not designated as troubled.

Discussion

The housing challenges that impact our community are deep and widely felt. The resources necessary to ameliorate the full extent of housing challenges are far greater than the resources available to our community to address these challenges. With this in mind, and considering the generally good condition of public housing in Dunkirk, we have prioritized funding for other housing programs during this program year. We will continue, though, to seek out opportunities to engage public housing residents in our community and to connect them with resources and services that may benefit them.

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

Introduction

We recognize that homelessness is a real challenge for some members of our community. The data presented elsewhere in this Plan indicate that a variety individuals and families experience homelessness for a variety of reasons. There are challenges that the local Continuum of Care and other local service providers face in addressing the needs of homeless persons, including the lack of a dedicated homeless facility in northern Chautauqua County. We are aware of these challenges and will look for opportunities to assist these organizations where possible.

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

Given the urgency of other housing challenges and the programs applied for by local agencies, our funding for this program year does not include homeless programs. That being said, we will continue working with our local Continuum of Care to provide assistance in reaching out to homeless persons and assessing their individual needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

Addressing the emergency shelter and transitional housing needs of homeless persons is an ongoing effort in Dunkirk. These needs are largely addressed by our local Continuum of Care, which is coordinated by Chautauqua Opportunities, Inc. (COI). We will work with COI to provide assistance in this effort where possible.

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

One of the ways we are working towards this goal in the upcoming program year is by working with Southern Tier Environments for Living, Inc. (STEL) on their Dunkirk Renovation and Ownership Program, which will create close to 50 new housing units in our community, a number of which will be targeted to homeless persons. Adding these new housing units and providing associated services will hopefully help

homeless persons make the transition to permanent housing and independent living.

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.

We will continue working with our local Continuum of Care to find ways to help low-income individuals and families avoid becoming homeless.

Discussion

Our first strategic plan goal is to provide safe, affordable housing for Dunkirk residents. With this in mind, in future program years we will consider funding any programs aimed at assisting low-income individuals and families avoid becoming homeless.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

As stated elsewhere in this Plan, quality affordable housing is one of the most pressing needs in our community. We are committed to providing expanded opportunities for affordable housing as well as removing any potential barriers to affordable housing.

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

We are currently unaware of any public policies that serve as barriers to affordable housing. However, given the importance of affordable housing to our community, we will continue to monitor for any policies that do have the effect of creating barriers to affordable housing. If such policies are discovered, we will make any necessary changes to ameliorate them.

Discussion:

We will continue to look for potential barriers to affordable housing and to remove those barriers where appropriate. For instance, one of the efforts we undertook in late 2017 and early 2018 was to examine housing challenges in our community. We worked with a planning consultant, czb, LLC, to identify and develop strategies to deal with vacant and distressed housing. As part of this project, czb provided recommendations to the City regarding housing policies and programs. If any of these recommendations can help us improve accessibility to affordable housing, then we will strongly consider implementing them.

AP-85 Other Actions – 91.220(k)

Introduction:

This section outlines other actions that we will undertake to address the needs and advance the goals set forth in this Consolidated Plan. These actions include efforts to better manage our CDBG program internally as well as actions to better coordinate our CDBG work with other community agencies.

Actions planned to address obstacles to meeting underserved needs

The largest obstacle to meeting underserved needs in our community is a lack of funding. We will diligently look for additional grant opportunities, especially those that will allow us to meet underserved needs, of which there are many in our community. For instance, we will seek out additional future funding for CHRIC's Roof Repair Program through New York State's Affordable Housing Corporation.

Actions planned to foster and maintain affordable housing

A number of the projects/programs that are proposed for funding in this program year are aimed at increasing housing accessibility or maintaining affordable housing for low- to moderate-income Dunkirk residents. These include:

- Chautauqua Housing Rehabilitation and Improvement Corp's (CHRIC) Acquisition/Rehab/Resale Program
- CHRIC'S Down Payment and Closing Cost Assistance Program
- CHRIC's Roof Repair Program

Actions planned to reduce lead-based paint hazards

We will continue working with local agencies, including Chautauqua Home Rehabilitation and Improvement Corps (CHRIC) and the Chautauqua County Department of Health and Human Services, that aim to reduce lead-based paint hazards in our community. Where possible, we will also seek out grant opportunities to address lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

The most effective way to reduce the number of poverty-level families is to improve the local economy. The City's Planning and Development Department works constantly to do just that by supporting local businesses, finding ways to attract new businesses, and seeking out available grant opportunities to improve our community and its economy. This work will continue going forward.

Actions planned to develop institutional structure

The City of Dunkirk will continue to look for ways to improve our institutional structure both within City Hall and with community organizations. We will seek ways to communicate better amongst City departments and with the organizations doing important work in the community. Among the actions currently planned are:

- Creating checklists and procedures to better follow CDBG processes
- Continuing education of the CDBG program, taking advantage of learning resources provided by HUD
- Creation of systems and internal structure to guide the City's CDBG program in the future
- Continuing information sharing between organizations and City staff to ensure that all are aware of resources available and can guide residents appropriately

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

The City's Planning and Development Department has started a business roundtable series that opens a dialogue between representatives from different sectors of the local economy. This idea could be extended to include public and private housing and social service agencies, which would help enhance coordination between the agencies.

City Planning and Development staff have also started participating in a homelessness workgroup run by the local Continuum of Care and attended by most of the local social service/housing agencies. This participation will further enhance coordination between the City and these agencies.

Discussion:

We will continue to look for ways to improve our administration of the CDBG program and our efforts towards meeting the CDBG programs goals. While the CDBG program is an effective tool in and of itself, we realize that the work undertaken through CDBG occurs in the context of other work being done in our community by a variety of agencies. All of these agencies provide a valuable contribution towards the well-being of our community, especially those higher needs residents requiring additional services. We will continue to work to ensure that our CDBG program is well-coordinated with other work being done in our community.

Program Specific Requirements

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

Introduction:

N/A

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	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.	85.00%

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)
NOT APPLICABLE

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

- e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

- f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

- g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

- h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or

employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the

guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

Discussion:

N/A