



HON. MAYOR WILFRED ROSAS

PY18 Amendment Draft 2023 ***(Con Plan AAP Draft 3, Amendment 2)*** **Amendments to PY18, PY19, PY20, PY21 & PY22**

This document is made available for review starting on September 22, 2023 followed by a 30-day public review and comment period starting September 22, 2023 and ending on October 30, 2023 at midnight.

Please submit your name, address, phone number, and comments by mail, fax, telephone, or email to:
City of Dunkirk Planning and Development Department (Attn: Nicole Clift), 342 Central Ave., Dunkirk, NY 14048; FAX 716-363-6460; PHONE 716-366-9878; or email nclift@cityofdunkirk.com

All comments must be in by midnight on October 30, 2023.

9.21.23 Amendment PY18,19,20,21,22 reallocates (\$141,479.16) unspent funds (includes CV Funds) from forfeited and reprogrammed projects. This reallocation includes: PY19 CHRIC Rehab & Resale (\$40,000.00) and PY20 CHRIC Rehab & Resale (\$30,000.00) reprograms to: A newly created PY19 CHRIC Rehab & Resale project (New Total \$70,000.00) which will be used to purchase & resale a property for resale to 1 new LMI homeowner and have a duration of 2 years. PY18 H.O.P.E. Community Center Rehab & Services (\$13,595.32) and PY21 City of Dunkirk Sidewalk Repair & Replacement (\$7,584.00) reprograms to: An existing PY22 City of Dunkirk Senior Center Improvements project (Original Total \$24,408.18) (Updated Total \$45,587.50) which will be used to create a new, safe sidewalk access for seniors at the Farmers Market Pavilion area. PY19 H.O.P.E. Community Center Rehab & Services (\$20,745.12) reprograms to: A new PY19 City of Dunkirk Wright Park Safe Access Walkways project (New Total \$20,745.15) which will be used to repair upheaved paved walkways that access Wright Park, create a new paved path to provide access from the Southern neighborhood to the park, along with install solar lighting for the safety of the city pedestrians. PY19 C.O.I. Rental Assistance project (\$24,554.60 CV Funds) and PY20 Access for the Arts Adams Center Renovations project (\$5,000.00) reprograms to: An existing PY22 Washington Park Improvements (Original Total \$12,000.00) (Updated Total \$41,554.69) which will be used to purchase & install a new spray pad water feature, fix the drinking fountain, and update electric to aid in outdoor activities for the prevention of coronavirus. September 22, 2023: Amendment Legal Notice published in Observer. October 13, 2023: Amendment Public Hearing held in the Mayor's Conference Room.

September 2020 amendment reallocates \$15,360 from Sidewalk project to 2019 Pier Improvements project. Public Art project cancelled and reprogrammed to PY19 Pier Improvements.

Executive Summary

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

1. Introduction

This Consolidated Plan outlines the City of Dunkirk's CDBG Program for the next three program years, 2018, 2019 and 2020. Rather than create a 5-year Consolidated Plan as in past years, we have decided that a shorter-term plan will provide the City increased flexibility to respond to the fast-moving changes occurring in our community.

The CDBG Program, managed by the U.S. Department of Housing and Urban Development (HUD), provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. Communities may use these funds as they see fit to best address their community development needs.

This Plan represents the culmination of a process to examine our community, identify the most pressing needs, and determine the most effective way to meet those needs. In this process, we strived to reach as many residents as possible for their input. We also relied on the expertise and knowledge of community organization and City staff. Through our community outreach and consultation, we hope that this plan accurately reflects the state of our community and its most pressing needs. We further hope that the work put into this plan will enable Dunkirk to have a successful and effective CDBG program for the next three program years.

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

Through this planning process, we have identified six priority needs for our community that we hope to address through our CDBG program:

1. Quality, affordable housing
2. Economic development
3. Children's after school/education programs
4. Community outreach
5. Infrastructure/pedestrian infrastructure
6. Recreation opportunities

These needs are ranked in approximate order of need, and were determined through our public engagement efforts for this Plan as well as our consultation with local organizations and non-profits. The top two priority needs, Quality, affordable housing and Economic development, stand apart as the two most fundamental issues in Dunkirk. *Many Dunkirk residents simply do not have good enough housing and do not have access to adequate economic opportunities.* These two issues are related and underly most other issues in our community.

Our goals for our CDBG program for the next three program years aim to address these needs. The issues in our community are deep and are decades in the making. We do not expect to solve them in the next three years. But we do hope that the CDBG program can be utilized effectively to make a positive difference in people's lives and in our community generally.

3. Evaluation of past performance

The past number of years of Dunkirk's CDBG program is filled with equal parts success and failure. On the success side of the ledger, we have successfully implemented a number of programs that have improved the quality of life for many residents. These programs include:

- Hoyt St. - the replacement of lead water lines and the repaving of the 300 block of Hoyt St.

- Emergency Home Repair - Chautauqua Home Rehabilitation and Improvement Corp (CHRIC) has assisted 19 Dunkirk residents with emergency home repairs
- Boys and Girls Club/Chautauqua Striders - over 100 Dunkirk students have participated in educational and mentoring programs offered by Boys and Girls Club and Chautauqua Striders
- Owner-Occupied Housing Rehabilitation - Chautauqua Opportunities, Inc. (COI) is assisting 6 Dunkirk homeowners with needed repairs and upgrades to their homes
- And many other projects

While we celebrate the many successes of Dunkirk's CDBG program, we must also acknowledge the challenges that the City's program has faced. For many years Dunkirk's CDBG program was mismanaged; it was not given the appropriate level of resources or oversight and was often used in ways that did not reflect the intention or spirit of the funding. We are just now recovering from the self-inflicted damage that this mismanagement caused and are cautious not to repeat the same mistakes. Additionally, our CDBG program has run into some challenges in spending program funds in a timely manner. This challenge is ongoing and is something we will keep in mind in the selection of future projects.

Evaluating the past performance of our CDBG program has helped inform our choice of goals and projects for this Consolidated Plan. First and foremost, we have paid special attention to meeting all program regulations, particularly ensuring that all projects considered are explicitly eligible and meet the National Objectives of the CDBG program. Given the ongoing challenges of timeliness in program spending, we are also aware of choosing projects that we know can be implemented quickly and effectively.

4. Summary of citizen participation process and consultation process

In preparing this plan, we made a strong effort to gather wide input from the Dunkirk community and utilize the knowledge and expertise of the organizations that are actively working in our community. We held a number of public meetings throughout the City to discuss the CDBG program and to gather input on community needs. These meetings were held at City Hall, the Dunkirk Farmers Market, the Dunkirk Public Library, the Fredonia Technology Incubator, the community room at the Dunkirk Housing Authority's Court Apartments. These meetings enabled us to reach a wide swath of Dunkirk residents for their input.

We also consulted with a number of local organizations that possess a deep knowledge of the community and its needs. These organizations included Chautauqua Housing Rehabilitation and Improvement Corp. (CHRIC), COI, the Chautauqua County Department of Health and Human Services, Revitalize Dunkirk, Hispanics Organized for Progress and Education (HOPE), Southern Tier Environments for Living, Inc. (STEL), the Dunkirk Housing Authority, and the Northern Chautauqua Community Foundation (NCCF). These organizations were instrumental in providing information on the state of our community and its most pressing needs.

5. Summary of public comments

A number of themes emerged from the public comments we gathered during our planning process, primarily addressing Dunkirk's most pressing community needs. These themes included the need for:

- Affordable, quality housing for all Dunkirk residents
- Improved pedestrian infrastructure
- Enhanced economic opportunities/job training
- Enhanced recreational opportunities
- Better outreach to diversity of residents

This input, combined with the other information gathered during this planning process, helped inform the priority needs identified in the Plan.

A draft version of this Plan was made available to the public for a thirty-day comment period on December 20, 2017, and a public hearing was held on January 8, 2018. At this public hearing, one attendee suggested that the priority needs listed in the plan could be more specific, pointing to "Economic development" as one need that could benefit from greater clarity. No other comments specific to the Consolidated Plan were received before the comment period closed after January 18, 2018.

A revised draft version of the Consolidated Plan was made available to the public for a thirty-day comment period on April 16, 2018, and a public hearing was held on that same day. Only one resident attended this public hearing and although he had a few questions, made no comments on the plan. No other comments were received before the public comment period closed on May 16, 2018.

More specific information and comments from our citizen participation process can be found in the Citizen Participation section of this plan.

A revised draft version of the Consolidated Plan was made available to the public for a thirty-day comment period on April 16, 2018, and a public hearing was held on that same day. Only one resident attended this public hearing and although he had a few questions, made no comments on the plan. No other comments were received before the public comment period closed on May 16, 2018.

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

A number of community members expressed the need for more and better transportation options for Dunkirk residents, especially low-income residents. While we acknowledge that this need is legitimate, public transportation is unfortunately not an activity that can be funded through the CDBG program. These comments therefore are not reflected in the remainder of this Consolidated Plan.

At one public meeting, a number of comments were made regarding very specific infrastructure issues in specific parts of the City. While these comments are appreciated and the general thrust of the

comments has been noted, many of the specific issues raised were too narrow in scope for consideration for CDBG funding.

At another public meeting, attendees had comments on many other community issues that were only tangentially related to the Consolidated Plan. These comments were recorded but will not be reflected in the Plan.

All other comments received during the plan's citizen participation process were accepted.

7. Summary

Dunkirk is a city with a proud, diverse population, a rich history, and a number of strong assets, including its location on the shores of Lake Erie. Recent changes in the community have residents optimistic about the future. But Dunkirk is also a community with a struggling economic base, higher than average levels of poverty, and high levels of need for many residents.

While we acknowledge that change does not occur overnight and Dunkirk has many challenges yet to overcome, we hope that resources provided by the CDBG program will help move our community in the right direction. We further hope that the work we put into this Plan, and the community input that helped shape it, will steer the CDBG program towards effectively tackling our most pressing needs.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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

Agency Role	Name	Department/Agency
Lead Agency	Dunkirk	
CDBG Administrator	Dunkirk	Department of Planning & Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Matthew Bourke, Community Development Planner

City of Dunkirk Department of Planning and Development

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

1. Introduction

The City of Dunkirk regularly works with local organizations and neighboring jurisdictions on a variety of projects and issues. We value the partnerships we have with these organizations. Our consultation with these partner organizations was essential in assessing the state of our community and the community's greatest needs.

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

In many ways the City of Dunkirk acts as a connection point between community agencies, including public and assisted housing providers and other service agencies. Where appropriate we will continue to coordinate between these agencies, especially in cases where communication appears to be lacking.

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

We work regularly with Chautauqua Opportunities, Inc. (COI), our local Continuum of Care coordinator, on a variety of projects and have a good relationship with staff members there. Because the City does not directly provide services to homeless persons and persons at risk of homelessness, our role is frequently to direct people in need to organizations like COI, Southern Tier Environments for Living, Inc. (STEL), or the Chautauqua County Department of Health and Human Services for assistance. While the City constantly strives to meet the needs of our residents, we acknowledge that coordination with the Continuum of Care to address the needs of homeless persons and person at risk of homelessness could be improved. Efforts this past year to improve that coordination included City staff attending meetings of the local Homeless Coalition and looking into the possibility for warming/cooling centers for homeless individuals.

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

The Continuum of Care generally makes these determinations independently and effectively. Where necessary, we will willingly participate in this process.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Chautauqua Opportunities, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Health Agency Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City works regularly with Chautauqua Opportunities, Inc., including as a subrecipient for the City's CDBG program. A meeting was held at Chautauqua Opportunities to discuss the CDBG planning effort and additional assistance was provided in answering specific Consolidated Plan questions. Consultation with Chautauqua Opportunities provided the City with an accurate and completed picture of housing conditions and needs in Dunkirk.
2	Agency/Group/Organization	Dunkirk Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A meeting was held at the Dunkirk Housing Authority to discuss the CDBG planning effort and additional assistance was provided in answering specific Consolidated Plan questions. Consulting with the DHA provided the City with an accurate and complete picture of needs related to and condition of public housing in the City.

3	Agency/Group/Organization	Chautauqua County Department of Health and Human Services
	Agency/Group/Organization Type	Services-Children Services-Persons with HIV/AIDS Services-Health Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Chautauqua County Department of Health and Human Services provided assistance in answering specific Consolidated Plan questions.
4	Agency/Group/Organization	CHRIC
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City works regularly with CHRIC, including as a subrecipient for the City's CDBG program. CHRIC employees were regular attendees at our CDBG public meetings, and provided valuable input on community needs.
5	Agency/Group/Organization	SOUTHERN TIER ENVIRONMENTS FOR LIVING, INC.
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City works regularly with STEL, including collaboration on a new, mixed-income housing development. STEL provided assistance with specific Consolidated Plan questions related to the City's special needs population, as well as housing generally.
6	Agency/Group/Organization	Hispanics Organized for Progress and Education
	Agency/Group/Organization Type	Health Agency Hispanic Outreach and Engagement
	What section of the Plan was addressed by Consultation?	Community Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	In an effort to better reach the Hispanic community in Dunkirk, we attended a HOPE meeting to explain the CDBG program/outreach and to ask for assistance in community outreach. Working with HOPE enabled us to better reach the Hispanic community to gauge community needs.
7	Agency/Group/Organization	Revitalize Dunkirk
	Agency/Group/Organization Type	Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Members of Revitalize Dunkirk provided input on community needs throughout the Consolidated Plan process. Consulting with Revitalize Dunkirk, an active neighborhood organization, provided a detailed picture of community needs at the neighborhood level.
8	Agency/Group/Organization	Northern Chautauqua Community Foundation
	Agency/Group/Organization Type	Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Northern Chautauqua Community Foundation provided valuable information on economic and workforce needs for our community.
9	Agency/Group/Organization	DFT
	Agency/Group/Organization Type	Technology Services
	What section of the Plan was addressed by Consultation?	Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	DFT is the City of Dunkirk's communications provider. They were consulted to help determine broadband needs for our community and provided valuable information on the broadband capabilities currently available in Dunkirk.
10	Agency/Group/Organization	CHAUTAUQUA COUNTY DEPT OF PLANNING & ECONOMIC DEVELOPMENT
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Chautauqua County Department of Planning and Economic Development was consulted with regards to vulnerability of our community to natural hazards. Our consultation with them provided valuable information with regards to natural hazard risks.

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

We did not purposely omit any agency types from our consultation process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Chautauqua Opportunities Inc.	Our Strategic Plan highlights safe, affordable housing as a primary goal for our community, which overlaps with the Continuum of Care's primary goal of ending homelessness.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Dunkirk 2013-2017 CDBG Consolidated Plan	City of Dunkirk	The 2013-2017 Consolidated Plan for the City of Dunkirk provided valuable historical context for our CDBG program, and many of the priorities outlined in that plan remain priorities today.
Brownfield Opportunity Area (BOA) Phase II Study	City of Dunkirk	The BOA Phase II Study prioritizes and highlights areas of the City for redevelopment, and provides more specific redevelopment project ideas. This plan can inform future economic development efforts for the City, a priority in this Comprehensive Plan.
Choosing Dunkirk Housing Report	City of Dunkirk/czb LLC	We are currently working with the planning firm czb LLC to assess the state of housing in our community and to formulate strategies to address distressed housing. This process has yielded valuable insight into housing in our community that has informed our CDBG planning effort.
Chautauqua County Hazard Mitigation Plan	Chautauqua County	Our strategic plan goals overlap with the goals of the County Hazard Mitigation Plan tangentially, insofar as vulnerability to natural hazards will be considered in our selection of projects to fund.

Table 3 – Other local / regional / federal planning efforts

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

The majority of Consolidated Plan implementation rests on City staff and local subrecipients, but we will work with the State and other local governments where appropriate.

Narrative (optional):

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

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

We made an effort in our citizen engagement process to utilize traditional public meetings and non-traditional outreach in hopes of reaching more residents. Non-traditional outreach included setting up an informational table at the Dunkirk Farmers Market and the Dunkirk Public Library. A series of public meetings were held in the spring and additional outreach was conducted in the fall, including outreach targeted at Hispanic and public housing residents.

The comments received during our citizen participation process impacted our goal-setting to a large extent. A number of needs were repeatedly mentioned as we conducted our public meetings, and echoed needs identified during our consultation process:

- Affordable, quality housing for all Dunkirk residents
- Improved pedestrian infrastructure
- Enhanced economic opportunities/job training
- Enhanced recreational opportunities
- Better outreach to diversity of residents

September 2023 Amendment to Program Year 2018,19,20,21,22 reallocates (\$141,479.16) unspent funds (includes CV Funds) from forfeited and reprogrammed projects.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	A public meeting and presentation were held on May 9, 2017 at the Fredonia Technology Incubator in Dunkirk to solicit input on the 2016 CAPER, 2017 Action Plan, and 2018-2020 Consolidated Plan. There were three community members present at the meeting. A Spanish translator was also present at the meeting.	There were a number of comments about the lack of transportation options for many Dunkirk residents. While there is a public transportation service that serves the county, the service does not run in the evenings. A desire was expressed to try to fund more creative CDBG projects, like a tool library. The need for a centrally-located community center was also expressed. Job training was also discussed as a potential CDBG program. For example, job skill development partnered with business courses to assist people in starting their own businesses.	No comments at this meeting were not accepted.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	A public meeting and presentation were held on May 24, 2017 at City Hall to solicit input on the 2016 CAPER, 2017 Action Plan, and 2018-2020 Consolidated Plan. There were two community members present at the meeting. A Spanish translator was also present at the meeting.	A number of housing issues were brought up at this meeting, including the need for education regarding fair housing laws. The age of the housing stock in the community was also brought up as a concern. The condition of rental housing was raised: 46% of Section 8 housing inspections in Dunkirk fail the first time. It was suggested that CDBG funds could be used for an additional housing inspector to encourage better rental housing maintenance. Lastly, the lack of a homeless shelter in northern Chautauqua County was noted. The accessibility of the CDBG application and program was discussed. Some small non-profits or organizations may find the application to be too large and intimidating, and there may continue to be a language barrier for some Dunkirk residents in terms of knowing what services are available.	No comments at this meeting were not accepted.	
	Consolidated Plan		Dunkirk		17	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Farmers Market Table	Non-targeted/broad community	A staffed informational table was set up at the Dunkirk Farmers Market on October 18, 2017 from 11:00 AM - 1:00 PM to solicit input on community needs and the 2018-2020 Consolidated Plan. Only one community member approached the table to offer comments.	The generally poor appearance of the City was identified as an ongoing hindrance to new development. The disrepair of many streets and sidewalks was also identified as a community concern. Lastly, better signage and marketing of public transportation options/schedules was suggested as a funding option, as well as improved bus shelters.	No comments were not accepted.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	A public meeting and presentation were held on October 23, 2017 from 6:00 to 7:30 PM at City Hall to solicit input on community needs and the 2018-2020 Consolidated Plan. There were four community members present at the meeting, as well as three members of the City of Dunkirk Planning and Development Department.	Sidewalk repair was identified as a community need. Many, many sidewalks in the City are in need of repair, and many residents travel on foot or bicycle using the sidewalks as their primary mode of transportation. Other transportation infrastructure needs, including missing crosswalk markings, broken crosswalk push buttons and broken curb cuts, were also identified. Expanded public transportation options was identified as a need, in addition to more/better information on currently available service. One attendee suggested that CDBG funds be used to bolster lakefront development. Another attendee pointed out that City parks can be difficult to reach for many residents and that not all facilities at parks are handicap accessible. Public art was identified as a potential use of CDBG funds. Lastly, a number of ongoing	A number of comments were made regarding very specific infrastructure issues in specific parts of the City. While these comments are appreciated, the issues raised were too narrow in scope for consideration for CDBG funding.	
	Consolidated Plan		Dunkirk		19	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Farmers Market Table	Non-targeted/broad community	A staffed informational table was set up at the Dunkirk Public Library on October 24, 2017 from 2:00 - 4:00 PM to solicit input on community needs and the 2018-2020 Consolidated Plan.	While a handful of people passed by the outreach table, only one person provided comments. He was not a Dunkirk resident, but worked in the community. Among the needs he sees in the community are programs for those recently released from prison and job training. He suggested a few program/project ideas: a job-training restaurant to learn work skills, an outdoor ice rink, or an indoor recreation area.	No comments were not accepted.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Farmers Market Table	Non-targeted/broad community	A staffed informational table was set up at the Dunkirk Public Library on November 2, 2017 from 2:00 - 3:30 PM to solicit input on community needs and the 2018-2020 Consolidated Plan. Printed materials were provided in both English and Spanish.	While a handful of people passed by the outreach table, only one Dunkirk resident provided comments. This resident said he was a veteran with mobility challenges who is frustrated by the lack of availability of affordable housing in Dunkirk. He said he has been in contact with the Dunkirk Housing Authority and Chautauqua Opportunities, Inc. about finding affordable housing but had been unable to find anything.	No comments were not accepted.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Meeting	Non-English Speaking - Specify other language: Spanish Residents of Public and Assisted Housing	A public meeting and presentation were held on November 27, 2017 from 5:30-7:00 PM at the Community Room at Smith Court Apartments, a Public Housing facility, solicit input on community needs and the 2018-2020 Consolidated Plan. Three community members attended the meeting, only one of whom spoke English. A Spanish translator was also present at the meeting.	Meeting attendees identified a number of community needs, some related to the specific needs of the Hispanic community in Dunkirk: more English as a second language course offerings, more safe and accessible recreation options for children, better public transportation options, and more outreach and accessibility related to available service programs from the City and local non-profits. A number of these comments echoed comments we had received at previous meetings.	No comments were not accepted.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Hearing	Non-targeted/broad community	A public hearing and presentation were held on January 8, 2018 from 5:30-7:00 PM in the Mayor's Conference Room at City Hall to present the draft 2018-2020 Consolidated Plan and 2018 Action Plan and to solicit input from the community on these documents. Four community members attended the meeting.	One attendee suggested that the priority needs listed in the plan could be more specific, pointing to "Economic development" as one need that could benefit from greater clarity.	Attendees had comments on many other community issues that were only tangentially related to the Consolidated Plan. These comments were recorded but will not be reflected in this document.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Hearing	Non-targeted/broad community	A public hearing and presentation were held on April 16, 2018 from 5:00-6:00 PM in the Mayor's Conference Room at City Hall to present the revised draft 2018-2020 Consolidated Plan and 2018 Action Plan and to solicit input from the community on these documents. One community member attended the meeting.	The attendee expressed some concern about the viability of funding non-profit programs that are not well-established.	All comments were accepted.	
10	Public Hearing	Non-targeted/broad community	Public hearing for September 2023 regarding the PY2018,19,20,21,22 AAP Amendment that was held on Oct 13, 2023, in the Mayor's Conference Room. 3 Attendees.	None	n/a	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The following sections present a detailed picture of Dunkirk's needs through a variety of lenses, mostly focused around housing. Housing needs can be summarized succinctly: our community needs more and higher quality housing options for all residents than are currently available.

The housing issues highlighted in the following sections include:

- Many Dunkirk residents face housing challenges, including substandard housing facilities and high housing cost burdens
- Minority and/or low-income residents, most of whom rent housing, are disproportionately impacted by these challenges
- While Dunkirk's homeless population is not estimated to be large, there are inadequate homeless facilities in our community

Beyond housing, pressing community needs include specific public improvements, like sidewalk repairs and replacement, and public services, like after-school programs, job training, and services for special needs populations.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

There exists a great need in Dunkirk for safe, affordable, quality housing. This need is apparent in the data provided below, and became apparent in the community outreach and consultation done in preparation of this Plan. The data indicate that low-income and/or minority households suffer from housing problems disproportionately and consequently have elevated levels of housing need.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	12,563	12,310	-2%
Households	5,341	5,350	0%
Median Income	\$31,674.00	\$38,937.00	23%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,015	890	955	630	1,860
Small Family Households	395	290	345	270	900
Large Family Households	40	65	105	35	40
Household contains at least one person 62-74 years of age	100	140	260	110	369
Household contains at least one person age 75 or older	60	150	100	95	150
Households with one or more children 6 years old or younger	189	110	210	150	160

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	45	10	0	55	0	0	0	10	10
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	4	0	0	4	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	10	40	0	0	50	0	15	0	0	15
Housing cost burden greater than 50% of income (and none of the above problems)	590	155	0	0	745	160	25	4	0	189
Housing cost burden greater than 30% of income (and none of the above problems)	110	160	55	10	335	30	110	135	30	305

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	40	0	0	0	40	0	0	0	0	0

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	595	245	10	0	850	160	35	4	10	209
Having none of four housing problems	150	290	365	205	1,010	70	320	575	415	1,380
Household has negative income, but none of the other housing problems	40	0	0	0	40	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	300	175	10	485	60	20	35	115
Large Related	25	30	0	55	15	0	4	19
Elderly	74	40	15	129	54	75	55	184
Other	305	135	30	470	60	34	44	138
Total need by income	704	380	55	1,139	189	129	138	456

Table 9 – Cost Burden > 30%

Demo

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	235	100	0	335	60	0	0	60
Large Related	25	30	0	55	15	0	0	15
Elderly	49	20	0	69	40	15	0	55
Other	285	40	0	325	45	4	4	53
Total need by income	594	190	0	784	160	19	4	183

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	0	44	0	0	44	0	15	0	0	15
Multiple, unrelated family households	10	0	0	0	10	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	10	44	0	0	54	0	15	0	0	15

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

According to data from the 2011-2015 American Community Survey, there are an estimated 1894 single person households in Dunkirk. While data is unavailable on the specific types and needs of these households, our community outreach and consultation provided some information to help answer this question.

Many single person households have elderly residents who struggle, financially and otherwise, to maintain their homes, many of which were constructed before 1950. These households demonstrate a high need for housing rehabilitation/improvement assistance.

People with special needs make up another proportion of single person household. Our consultation with the Dunkirk Housing Authority (DHA) and Southern Tier Environments for Living, Inc. (STEL) suggests that there may not be enough accessible units in Dunkirk's housing stock to meet the needs of our community's special needs population.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

We are still working to acquire accurate estimates for this data. Our available data suggests that these groups do have a demonstrated housing need, but the extent is yet unclear.

What are the most common housing problems?

According to Chautauqua Opportunities, Inc., the most common housing problems in Dunkirk are a lack of affordable housing, health and safety issues in the house, vacant/abandoned properties, and lower homeownership rates than the rest of county. Additional public input and consultation indicates that lack of housing maintenance is also a common housing problem.

Are any populations/household types more affected than others by these problems?

Yes, some populations/household types are more affected than others by these problems. Specifically, single-parent households, African Americans, and Hispanic residents are more affected than others by these problems.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of

either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

According to Chautauqua Opportunities, Inc., households at risk of homelessness are frequently facing financial hardships related to unstable income and/or lack of reliable transportation to access employment options. For households with children, child care options are available, such as Head Start and subsidized child care. However, housing instability can be very disruptive to children's education and can contribute to health problems. Households that have been rapidly rehoused are on a pathway to housing stability, but require assistance addressing the factors that led to their housing instability. In addition to lack of employment/income, those factors could include a need for drug rehabilitation, untreated mental health issues, family issues, and other factors. Supportive services are required to work with families to ensure their ongoing housing stability.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Tenants who do not have a standard lease agreement with their landlord are more vulnerable to housing instability. In the community in general, there is a need for education on tenant rights. Many tenants are not aware of their rights as tenants and how these rights can protect them.

Discussion

Housing, along with economic development, likely represents the single biggest community need in Dunkirk. The two needs are strongly correlated: a primary reason for housing challenges faced by Dunkirk households is the lack of stable economic base. As the data presented in this section indicate, many households struggle with physical/maintenance problems and a high housing costs burden. Unsurprisingly, these issues are particularly acute for our community's low-income population.

Housing has been indicated as a Priority Need in this Plan. Given the scale of the housing challenges that our community faces, it will likely remain a Priority Need for years to come.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Many Dunkirk residents suffer from a range of housing challenges, from homelessness, to housing insecurity, to substandard or overcrowded housing. These issues are apparent on a number of levels, borne out by available data, by discussions with area residents, by consultation with local agencies/organizations, and by traveling through many neighborhoods in the city.

The data presented below make clear that there are many households in Dunkirk with earnings below the Area Median Income, and many of these households deal with a variety of housing challenges. Of these households, minority populations are disproportionately impacted.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	890	80	40
White	435	65	25
Black / African American	95	0	0
Asian	0	0	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	345	20	20

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	550	340	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	335	250	0
Black / African American	55	10	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	165	80	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	205	750	0
White	160	525	0
Black / African American	25	25	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	19	200	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	45	585	0
White	45	455	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	100	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

For households earning 0-30% of the Area Median Income, there are 930 households that suffer from at least one of the four housing problems. Of these 930 households, 420, or 45%, have Hispanic residents. In the community as a whole, the Hispanic population makes up roughly 26% of the total population. It is clear, then, that low-income Hispanic households suffer disproportionately in terms of living with any of the four major housing problems.

For households earning 30-50% of the Area Median Income, there are unsurprisingly fewer households experiencing any of the four housing problems. In this income bracket, African American households are disproportionately represented, making up nearly 19% of affected households while making up just 6% of the population as a whole.

For household earning 50-80% of the Area Median Income, Hispanic households are once again disproportionately represented, making up nearly half of impacted households.

The data make clear that the two largest minority populations in Dunkirk, Hispanics and African Americans, experience disproportionately greater impacts in living with any of the four major housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Moving from the examination of housing problems to severe housing problems, the data make clear that a large majority of the households experiencing housing problems are actually experiencing severe housing problems. Minority households are also disproportionately represented in the data presented below.

Once again, these data are reflective of the anecdotal evidence in Dunkirk, from talking to residents and community organizations, that 1. a large percentage of housing in Dunkirk is substandard and 2. lower-income and/or minority households suffer most from this substandard housing.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	755	220	40
White	360	135	25
Black / African American	95	0	0
Asian	0	0	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	280	85	20

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	280	610	0
White	130	455	0
Black / African American	55	10	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	100	140	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	14	940	0
White	14	675	0
Black / African American	0	50	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	215	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10	620	0
White	10	495	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	100	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Many households in Dunkirk deal with at least one of the four severe housing problems. As with the other housing needs addressed in this assessment, minority groups are disproportionately impacted by these problems. For households earning 0-30% of Area Median Income, of the 820 households that experience one of the four severe housing problems, 340 (41%) are Hispanic households. This percentage is much higher than the percentage of all households in Dunkirk that are Hispanic, 26%. The same trend holds true for households earning 50-80% of Area Median Income: Hispanic households are disproportionately impacted by severe housing problems.

For households earning 30-50% of Area Median Income, African American households are disproportionately impacted by severe housing problems. Of the 235 households in this income bracket that suffer from at least one of the four severe housing problems, 75 are African American, or 32%. This percentage is much higher than the percentage of all households in Dunkirk that are African American, just 6%.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

It is widely accepted that households should ideally spend no more than 30% of their income on housing. Dunkirk poses an unusual test case for this rule. On the one hand, housing in Dunkirk is quite affordable relative to national housing prices. On the other hand, Dunkirk suffers from a weak local economy and an elevated poverty rate. So, in spite of seemingly affordable housing, many households struggle to afford safe, quality housing.

This fact was noted anecdotally during our public outreach effort for this Plan, and is borne out in the data presented below. While the majority of Dunkirk residents do spend less than 30% of their income on housing, there are still many households that pay more than that. Many households even pay upwards of 50% of their income on housing, a major and debilitating cost burden.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	3,660	674	974	40
White	2,980	475	490	25
Black / African American	60	25	135	0
Asian	0	0	0	0
American Indian, Alaska Native	0	0	20	0
Pacific Islander	0	0	0	0
Hispanic	595	180	325	20

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

As with the other housing needs addressed in this section, minority groups suffer disproportionately from housing cost burdens. For Dunkirk as a whole, 19% of households pay more than 50% of their income on housing. For Dunkirk's Hispanic community, this figure jumps to 34%. For African American households in Dunkirk, 42% pay more than 50% of their income on housing.

A number of factors may contribute to a high housing cost burden for Dunkirk residents, but fundamental among them is a lack of economic opportunity. It is difficult to imagine our community's housing becoming less expensive without associated, negative impacts of housing quality and safety.

Demo

Creating additional economic opportunity is therefore paramount to reducing the housing cost burden that many households face.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Hispanic and African American households face disproportionately greater housing needs across almost every income category.

If they have needs not identified above, what are those needs?

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Census data suggest that the City's African American population is not concentrated in any specific portion of the community. Census data also indicate the Hispanic population in Dunkirk is fairly well distributed throughout the community.

NA-35 Public Housing – 91.205(b)

Introduction

The Dunkirk Housing Authority (DHA) manages a much-needed supply of affordable housing for our community. While the needs of the DHA appear to be managed well, the needs of public housing residents reflect many of the needs of other low-income residents in Dunkirk. The majority of DHA residents are now Hispanic, which presents an additional layer of outreach needs that we hope to address through our CDBG program.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	207	0	0	0	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,147	0	0	0	0	0
Average length of stay	0	0	4	0	0	0	0	0
Average Household size	0	0	1	0	0	0	0	0
# Homeless at admission	0	0	6	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	85	0	0	0	0	0
# of Disabled Families	0	0	55	0	0	0	0	0
# of Families requesting accessibility features	0	0	207	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	197	0	0	0	0	0	0
Black/African American	0	0	10	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	111	0	0	0	0	0	0
Not Hispanic	0	0	96	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Like many Dunkirk residents, public housing tenants generally are in need of expanded economic opportunity, and to a lesser extent increased recreational opportunity. Nearly one half of public housing residents are elderly and may require higher levels of health care services. Many DHA residents are disabled in some capacity and may require special needs services beyond which the DHA can provide. Lastly, in order to reach and involve in the community the majority of DHA residents who are Hispanic, expanded Spanish-language outreach may be necessary.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

According to the DHA, as of March 2018 there were 9 people on the public housing waiting list for 1 bedroom's units, 10 people on the waitlist for 2 bedroom units, 2 people on the waitlist for 3 bedroom units, and 8 people on the waitlist for 4 bedroom units. These relatively low numbers likely underestimate potential demand for these units. The waiting list for section 8 rental assistance is much longer, likely many times the waiting list for public housing units.

The most immediate needs of residents of public housing and Housing Choice voucher holders are additional affordable housing options, access to good-paying jobs, and access to public services.

How do these needs compare to the housing needs of the population at large

The housing needs of public housing residents are comparable to the needs of other low-income Dunkirk residents. There is a strong need in our community for increased availability of stable, safe, affordable housing options. This need applies most acutely to low-income and minority residents.

Discussion

As stated previously, the DHA manages a much-needed supply of affordable housing for our community. The data presented in this section demonstrate a public housing population that is frequently elderly and/or disabled, and often living alone. The average household size for public housing units is one, average annual household income is slightly more than \$13,000, and the majority of public housing residents are Hispanic. Taken together, these data suggest that public housing residents are likely to have higher levels of need than the population generally.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Dunkirk recognizes homelessness as a real, underappreciated issue in our community. Unfortunately, data on the full extent of homelessness in Dunkirk specifically is not fully available. In preparing this plan, we have consulted with the local Continuum of Care coordinator, Chautauqua Opportunities Inc. (COI), who have provided data on homelessness at the County level. We have used this county-level data to provide estimates for the extent of homelessness in Dunkirk.

While data may be lacking on the full extent of homelessness in Dunkirk, we are aware that adequate facilities to shelter the homeless population do not currently exist. Through the Continuum of Care there are some shelters/housing available to those in need, some permanent and some temporary. But the lack of a dedicated homeless shelter does appear to pose ongoing challenges to the Continuum of Care.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	15	25	0	0	0
Persons in Households with Only Children	0	3	5	0	0	0
Persons in Households with Only Adults	0	15	25	0	0	0
Chronically Homeless Individuals	0	5	8	0	0	0
Chronically Homeless Families	0	2	4	0	0	0
Veterans	0	2	4	0	0	0
Unaccompanied Child	0	2	4	0	0	0
Persons with HIV	0	1	2	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Data on homelessness in Chautauqua County was provided by Chautauqua Opportunities, Inc., the local Continuum of Care coordinator. Data was proportionally estimated for Dunkirk.

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	50	0
Black or African American	5	0
Asian	1	0
American Indian or Alaska Native	1	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	15	0
Not Hispanic	45	0

Data Source

Data on homelessness in Chautauqua County was provided by Chautauqua Opportunities, Inc., the local Continuum of Care coordinator. Data was proportionally estimated for Dunkirk.

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

We estimate that in a given year there are between 5 and 10 families with children that may experience homelessness and require housing assistance. The available data suggests that in a given year even fewer families of veteran's experience homelessness and require housing assistance, likely less than 5 families.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Our estimates suggest that minority groups make up roughly one third of the homeless population in Dunkirk. This is roughly proportional to general population, where minority groups also make up about one third of the population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Data on sheltered homelessness in the County demonstrate that a variety of different homeless situations are confronted and provided for, ranging from temporary homelessness to longer term homeless for a variety of household types. There also appears to be a range of situations that may be contributing to homelessness, including physical disabilities, mental health challenges, substance abuse, chronic health conditions, and/or domestic violence. In the past year, we estimate that roughly 60 individuals in Dunkirk were provided shelter or other homelessness assistance by the Continuum of Care.

Data on the unsheltered homelessness is unfortunately not available and in general can be difficult to obtain. Anecdotally, there does not appear to be a large unsheltered homeless population in Dunkirk. But given the data on sheltered homelessness, there is a high likelihood that some individuals in the community do experience unsheltered homelessness.

Discussion:

Homelessness is not a particularly visible issue in Dunkirk and therefore is easier to overlook as a housing need to be addressed. We are fortunate to have a well-coordinated Continuum of Care in our community that can provide some level of assistance to people experiencing homelessness. But we also recognize that homelessness remains an ongoing challenge for our community to address. We will continue to work with our Continuum of Care to offer housing assistance to homeless individuals and families.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Dunkirk, like many communities, has a sizable population that require special needs and services. Because of its economic circumstances, Dunkirk is not as well equipped to handle the special needs of these populations, and many of these needs may go unmet. A number of residents rely on the services provided by organizations like Southern Tier Environments for Living (STEL), Chautauqua County Department of Health and Human Services, Meal on Wheels, and the Resource Center. These service providers are essential in ensuring that the special needs of these populations are addressed, but more resources are likely necessary to ensure that special needs continue to be met.

Describe the characteristics of special needs populations in your community:

The special needs populations in Dunkirk include the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, and persons with HIV/AIDS and their families.

What are the housing and supportive service needs of these populations and how are these needs determined?

Special needs populations share many of the same needs as the community as a whole: better access to safe, affordable housing, better access to jobs, increased recreational opportunities, and others. But as the term special needs makes clear, these populations require additional, specialized needs, including care management, mental health treatment, physical health care, education and employment opportunities, peer support, daily living and money management skills training.

These needs have been determined in consultation with local organizations that provide services to special needs populations, including STEL and the Chautauqua County Department of Health and Human Services.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Data on the population with HIV/AIDS were only available on the County level in our area. According to data provided by Chautauqua County, as of December 2014 there were 210 individuals in the County living with HIV and/or AIDS. The overwhelming majority of these 210 individuals were male (155, vs. 55 female). 90 individuals (43%) were White, 73 (35%) were Hispanic, 23 (11%) were Black, and 24 (11%) were considered Multi Race.

We were unable to locate data on the families of those individuals living with HIV/AIDS.

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

Discussion:

In a resource-constrained environment, the special needs population, with higher levels of service required for adequate care, is especially vulnerable. The City of Dunkirk and local service providers must continue to work together to address special needs in our community. Projects like STEL's upcoming Dunkirk Renovation and Ownership Program, which will provide many new housing units and services to special needs populations, should continue to be pursued where funding is available.

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

Describe the jurisdiction's need for Public Facilities:

Public facilities in Dunkirk generally meet the basic needs of the community. The City's water and sewer systems are strong, capable of supporting current needs and additional growth. The City's park system is an asset, providing more outdoor recreation opportunities than many similarly sized cities can provide.

Some residents have pointed to the need for additional recreation opportunities, particularly indoor recreation opportunities or an outdoor ice rink. While the City is able to rent space for indoor recreation during the winter, there is no publicly owned building dedicated to recreation.

The larger need and continual challenge are ongoing maintenance and upkeep of public facilities, described below.

How were these needs determined?

These needs were determined by consultation with City staff and from citizen engagement in the planning effort.

Describe the jurisdiction's need for Public Improvements:

While public facilities in our community generally meet the basic needs of the community, ongoing maintenance and upkeep of these facilities is a continual challenge. In particular, many sidewalks, roads, and underground infrastructure are in need of repair or replacement.

Some improvements are already underway. The City's park system is in the process of receiving long-needed upgrades to Point Gratiot Park and Wright Park. A multi-million-dollar upgrade to the City's water treatment plant is also underway. Additionally, the City typically undertakes a small number of road/infrastructure improvements projects each year, some of which have been funded through CDBG.

Looking beyond immediate need, we feel that many public spaces could use aesthetic improvements to help improve the appeal and look of our community.

Fortunately for the City, there is a strong foundation of fiber-optic internet coverage throughout the community, while improvements to that system are ongoing. Free Wi-Fi is also being provided along most of Dunkirk's Lake Erie shoreline. The City has a strong partnership with DFT Communications, our local technology provider, and will continue to partner with them to improve connectivity throughout our community.

How were these needs determined?

These needs were determined by consultation with City staff and from citizen engagement in the planning effort.

Describe the jurisdiction's need for Public Services:

Dunkirk has a demonstrated need for a variety of public services. These services include:

- After-school programs
- Job training
- Homebuyer down payment assistance
- Housing counseling
- Recreation programs
- And others

The demand for these types of services far outweighs their availability and the community's ability to fund the services, although we have utilized CDBG funding in past years to fund some of these types programs. That being said, we appreciate the organizations in our community that work to provide these services to the best of their ability.

How were these needs determined?

These needs were determined by consultation with local organizations and City staff, and from citizen engagement in our outreach effort.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The following sections provide an analysis of the current state of Dunkirk's housing market/stock, available community services, and other community assets. Key takeaways from these sections include:

- Housing in Dunkirk is generally affordable, but many low-income households struggle to find safe, quality housing that does not place cost burdens on them
- Due to the age of much of the community's housing stock and to deferred maintenance, many homes are in poor condition, particularly rental homes
- Dunkirk's public housing is in solid shape, but homeless facilities are lacking
- A variety of community services are available for residents, particularly those with special needs, but on the whole need for these services outweighs the capacity of local organizations to handle them
- While Dunkirk's infrastructure is healthy enough to support the local economy, creating a more skilled, educated workforce will likely be necessary for Dunkirk to remain competitive economically

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Due to a slowly declining population and soft housing demand, there are in general terms an adequate number of housing units to house the City's population. Looking beyond the numbers, though, and one can see a variety of housing needs that are not met by the City's current housing stock. These needs are described in greater detail below.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	3,680	61%
1-unit, attached structure	185	3%
2-4 units	1,865	31%
5-19 units	115	2%
20 or more units	185	3%
Mobile Home, boat, RV, van, etc	50	1%
Total	6,080	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	20	1%	35	2%
1 bedroom	60	2%	505	24%
2 bedrooms	630	20%	875	41%
3 or more bedrooms	2,510	78%	720	34%
Total	3,220	101%	2,135	101%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

We are currently working with local organizations to get a fuller picture of the number and targeting of units assisted with public programs. Listed below of some of the figures that we are aware of regarding public assistance:

- **Federal** - HUD supports over 200 housing units through the Dunkirk Housing Authority (DHA) and dozens more have been assisted through CDBG programs

- **State** - New York's Office of Housing and Community Renewal (HCR) assists a number of homes each year in Dunkirk with housing rehabilitation, in addition to supporting Southern Tier Environments for Living's (STEL) new housing development that will provide dozens of new, assisted housing units to our community
- **Local** - Chautauqua County Rural Ministries provides 19 units of affordable housing at the Coburn Block building

Chautauqua Opportunities, Inc. (COI) and Chautauqua Home Rehabilitation and Improvements Corp. (CHRIC) also receive federal and state support for other housing programs that assist Dunkirk residents.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There are currently 877 Section 8 vouchers in Chautauqua County. This is down from 944 from 2016, due to funding cuts at the State and Federal levels. While we do not anticipate additional funding cuts, recent trends would suggest that cuts are possible. Unit counts at the Dunkirk Housing Authority remain stable.

It is possible that further deterioration of some older homes will remove potential units from the affordable housing inventory. This impact is difficult to estimate, but we hope that some of the housing rehabilitation programs we will look to fund can help prevent the loss of these units.

Does the availability of housing units meet the needs of the population?

The availability of housing units generally does not meet the needs of the population, especially the low-income and special needs population. Many residents struggle to find adequate, affordable housing. The underlying issue is more about condition and market demand rather than number of units available, although data suggest that the rental market in Dunkirk has tightened in recent years. There appear to be fewer units available now than there has been in recent years.

Describe the need for specific types of housing:

There is a greater need for housing (and services) that accommodates special needs populations than is currently available. More specifically, according to the Chautauqua County Department of Health and Human Services, there is a significant need for further development of quality, affordable housing for the homeless, disabled, those with serious mental health concerns, and those battling addiction. Southern Tier Environments for Living, Inc. (STEL) is in the process of constructing new housing intended in part for these populations, but more housing is needed.

As discussed elsewhere in this plan, there is also a generalized need for better quality, affordable housing for our community's low-income population.

Discussion

The majority of housing units in Dunkirk are owner-occupied. While there are certainly many owner-occupied homes in need of improvements and repairs, these needs are even more pronounced in the City's rental market, where low rents have discouraged many landlords from making the necessary improvements to their properties. According to data prepared for the City's Vacant Property Task Force, over half of Dunkirk's problems properties - those with high levels of distress or vacancy - are rental properties.

Work to improve the condition of our community's housing stock is ongoing.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

It is tempting to look at the soft demand for housing in Dunkirk - and correspondingly low housing prices - and to think that housing is affordable. And while this is true an extent - housing is affordable relative to many other communities, especially for households with stable incomes - many households still struggle to find safe, quality, affordable housing. A large number of households also face severe housing cost burdens, paying upwards of 50% of income on housing.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	55,400	64,700	17%
Median Contract Rent	430	449	4%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,254	58.7%
\$500-999	854	40.0%
\$1,000-1,499	0	0.0%
\$1,500-1,999	4	0.2%
\$2,000 or more	10	0.5%
Total	2,122	99.4%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	230	No Data
50% HAMFI	865	630
80% HAMFI	1,665	1,225
100% HAMFI	No Data	1,670
Total	2,760	3,525

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent					
High HOME Rent					
Low HOME Rent					

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Many residents in Dunkirk struggle to find safe, affordable and stable housing. Census data on Gross Rent as a Percentage of Housing Income (GRPI) provides a good measure of the need for affordable housing. The latest 5-year estimate for Dunkirk shows that 53.7% of renters pay more than 35% of their income in gross rent. This is a staggeringly high number if we consider that for housing to be considered affordable, the cost should be no more than 30% of a household's income.

In short, then, there is not sufficient housing in Dunkirk for households at all income levels. Lower-income households, especially those earning less than 50% of HAFMI, continue to struggle to find adequate housing.

How is affordability of housing likely to change considering changes to home values and/or rents?

We do not anticipate significant changes to home values or rents over the next three years. Although given the recent trend of rising rents for many of the City's housing units, housing could become even less affordable for many of Dunkirk's lower-income residents.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME and Fair Market Rents for Chautauqua County as a whole are both roughly 20% higher than the Area Median Rent in Dunkirk. This might suggest that HOME and Fair Market Rents in other parts of the county are higher than they are for Dunkirk specifically. Unfortunately, data on HOME and Fair Market Rents are only available at the county level.

Discussion

Housing affordability in Dunkirk is impacted less by housing prices, which are relatively low compared to other communities, and number of housing units than by the City's struggling economic base. Many households simply do not have enough income to afford safe, quality housing. As previous sections of this Plan have made clear, many low-income households continue to face high housing cost burdens.

And the units that can be afforded are frequently of substandard quality. As this section and many others make clear, housing quality and affordability remains one of the primary challenges to overcome in our community.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

As note elsewhere in this Plan, the majority of the housing stock in Dunkirk was constructed before 1950. This fact of an aging housing stock, combined with a struggling economic base, has resulted in deferred maintenance and poor living conditions for many households. This is especially true for lower-income rental households. According to Chautauqua Opportunities, Inc. (COI), 46% of Section 8 housing inspections fail the first time.

Many older homeowners, who often have fixed incomes, also struggle to maintain their homes. Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC) has ongoing programs for home repair assistance. There are currently 111 City of Dunkirk residents on the waiting list for these programs, many of whom are seniors. Some of these residents have been on the waiting list for years without being able to secure the necessary assistance; program demand simply outweighs the availability of resources.

Definitions

The City of Dunkirk Code does not define "substandard condition" or "substandard condition but suitable for rehabilitation" specifically. The relevant section of the City Code that addresses housing standards is Chapter 41, Housing Standards.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	515	16%	1,105	52%
With two selected Conditions	0	0%	50	2%
With three selected Conditions	0	0%	30	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	2,700	84%	950	45%
Total	3,215	100%	2,135	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	30	1%	0	0%
1980-1999	95	3%	75	4%
1950-1979	960	30%	620	29%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	2,135	66%	1,440	67%
Total	3,220	100%	2,135	100%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,095	96%	2,060	96%
Housing Units build before 1980 with children present	55	2%	15	1%

Table 35 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	75	75	150
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source Comments: Data are estimates provided by czb,LLC for the report Choosing Dunkirk

Need for Owner and Rental Rehabilitation

There is a large need for both owner-occupied and rental rehabilitation in Dunkirk. This need stems in large part from the age of the community's housing stock. 72% of owner-occupied units (2412 units) and 66% of renter-occupied units (1485 units) were built before 1950. Older homes generally require more maintenance, and many of the homes in our community are larger older homes that create added maintenance challenges. The fact that Dunkirk has suffered economically over the past number of decades has only exacerbated the challenge of housing maintenance. Many residents simply do not have the money to maintain their homes, and low rents discourage many landlords from making improvements to rental housing.

Our consultation and community outreach efforts echo the rehabilitation needs indicated by the data. We have heard from many residents, especially older residents, about unmet home rehabilitation needs that they are unable to pay for.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

We estimate that there are between 1200 and 1400 housing units within Dunkirk that are occupied by low- or moderate-income families that contain lead-based paint hazards. This estimate accounts for roughly one quarter of all households in the City.

Discussion

Poor housing conditions creates impacts both inside and outside the home. On the inside, issues like lead paint, leaking roofs, or substandard kitchen/plumbing facilities can create unsafe living conditions, especially for vulnerable populations and children. On the outside of homes, poor housing conditions can create a negative perception of our community and a drag on the local housing market. Both of these issues will need to continue being addressed.

Programs are needed to address housing condition issues for homeowners and renters alike. It should be noted, though, that available data suggest that renters, especially low-income renters, are much more likely to face poor housing conditions than are homeowners.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Public Housing in the City of Dunkirk is managed by the Dunkirk Housing Authority (DHA). The DHA manages 234 total units spread out throughout a number of housing facilities in the city. The biggest housing facility under the supervision of the DHA is Steger Apartments, an eleven-story high-rise close to the Lake Erie shoreline with 100 units for senior and disabled residents. Other DHA units are spread throughout Dunkirk. The DHA reports that its housing is generally in good physical condition, a product of regular maintenance and improvements. The population of public housing residents is increasingly diverse; the DHA estimates that over 90% of family housing units are occupied by Hispanic residents.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			233						
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The DHA manages 234 housing units in the City of Dunkirk. While there are no doubt improvements that can continue to be made, the DHA reports that public housing units in Dunkirk are in good physical condition. Regular repairs and improvements ensure that units remain in good physical condition. For instance, since 2014 Steger Apartments has received a number of upgrades: a new fire alarm, new energy management systems, new roof exhaust vents, and a new exterior. These sorts of improvements have been occurring regularly at other DHA sites as well.

Public Housing Condition

Public Housing Development	Average Inspection Score
Bell Towers	79
Court Apartments	79
Other scattered units	79
Second St. Apartments	79
Smith Court Apartments	79
Steger Apartments	79

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The DHA reports that public housing is generally in good physical condition, and there are no dire restoration and revitalization needs. The most pressing need identified is the addition of security cameras at all DHA sites, although a number of sites already have security cameras installed. The DHA has also identified additional 2-3-bedroom handicap accessible units as a need in the community. While some of these units do already exist in the DHA portfolio, more are needed. Of all the facilities in Dunkirk, the DHA identified Court Apartments as the facility that could most use additional funding for restoration and revitalization. That being said, Court Apartments has had a number of revitalization projects done in the past number of years, including new siding, roofing, kitchens and fencing at various buildings throughout the site.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The mission of the DHA is to provide drug free, decent, safe and sanitary housing for eligible families and to provide opportunities and promote self-sufficiency and economic independence for residents. Among its goals are promoting self-sufficiency and asset development of assisted households by continuing to cooperate with DSS, Chautauqua Works, Chautauqua Opportunities Inc., and employment services that exist in the community.

Discussion:

The DHA is an important source of housing options for low-income Dunkirk residents. Fortunately, the organization has been well-managed and has been in a position to provide much-needed housing for the community. We anticipate that the DHA will continue to be a safe, affordable, important housing option for low-income residents.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

While data may be lacking on the full extent of homelessness in Dunkirk, we are aware that adequate facilities to shelter the homeless population do not currently exist. Both Chautauqua Opportunities, Inc. (COI) and the Chautauqua County Department of Health and Human Services have identified this as an ongoing need in our community. Through the Continuum of Care there are some shelters/housing available to those in need, some permanent and some temporary. But the lack of a dedicated homeless shelter does appear to pose ongoing challenges to the Continuum of Care.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

There are a number of organizations in Dunkirk that offer health, mental health, and employment services, many targeted to homeless persons. Southern Tier Environments for Living, Inc. (STEL) provides counseling services and works with area treatment agencies to enable tenants with mental health issues and other special needs to develop the skills necessary to transition to independent living. The Chautauqua County Department of Health and Human Services also provides an array of these services, frequently working with homeless individuals and families and directing them to available resources.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Within the Homeless Coalition there are a number of services provided:

- COI Safehouse (in Dunkirk) – emergency shelter for homeless youth
- COI Transitional Independent Living Program (in Dunkirk) – transitional housing for youth
- DSS Emergency shelter assistance – emergency shelter for homeless families and individuals (3 local hotels used)
- COI Emergency shelters – 2 single family homes in Dunkirk used for homeless families
- STEL – permanent supportive housing units for chronically homeless with mental health issues
- HOME – permanent supportive housing units for chronically homeless with mental health issues
- COI Supportive Services for Veteran Families (SSVF) program – rapid rehousing and homelessness prevention assistance and services for Veterans and their families
- COI STEHP program – rapid rehousing and homelessness prevention assistance for individuals and families

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Dunkirk, like many communities, has a sizable population that requires special needs and services. This population may include the elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS, and others. Because of its poor economic circumstances, Dunkirk is not as well equipped to handle the special needs of these populations, and many residents rely on the services provided by organizations like Southern Tier Environments for Living (STEL), Chautauqua County Department of Health and Human Services, Meal on Wheels, and the Resource Center. These service providers are essential in ensuring that the special needs of these populations are met.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

These populations demonstrate a number of supportive housing needs. First and foremost is securing safe, affordable housing. Beyond housing, identified needs of the referenced populations may include care management, mental health treatment, physical health care, education and employment opportunities, peer support, daily living and money management skills training. In addition, these populations may need linkage to and assistance with obtaining public benefits, meal programs, English language courses, and assistance with housing maintenance for those who are homeowners.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

STEL provides a number programs and services that help persons returning from mental and physical health institutions receive appropriate supportive housing. These programs include care management services, employment services, linkage with community providers, supportive counseling, and assistance in daily living. STEL's residential programs effectively address the needs of the mentally ill through a multidisciplinary team approach consisting of: outpatient therapists, drug/alcohol counselors, and medical professionals from various disciplines to help the targeted population maintain independence and perform activities of daily life.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Dunkirk has been working with STEL on a new housing development that will provide a range of housing options, including those with supportive services. The project involves the new construction of 11 buildings (with 29 apartments) and rehabilitation of 14 existing one and two-family houses (with 20 apartments), resulting in 25 total buildings and a total of 49 units of affordable rental housing for low income individuals and families. The populations to be served by the project include low-income individuals and families, persons with serious or severe mental illness, and persons who are homeless. Five units will be handicap accessible and two units will be adapted for households including a person with hearing/visual impairments. STEL will provide supportive services for the special need's population of the project.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

See above

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

While the City of Dunkirk will continue to monitor for whether public policies have a negative impact on affordable housing and residential investment, at this time we are not aware of any particular policies that create a negative impact. We will continue to look for opportunities to support affordable housing and residential investment, both of which are sorely needed in the community.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Dunkirk's economy has historically been dominated by manufacturing. Although the manufacturing economy in the region has declined throughout the past few decades, it continues to be the largest employment sector in our community. Unfortunately, it appears that the local workforce is not keeping pace with the changing demands of the global economy, and many employers are struggling to find adequately skilled and educated employees.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	92	0	2	0	-2
Arts, Entertainment, Accommodations	513	244	14	6	-7
Construction	110	70	3	2	-1
Education and Health Care Services	710	997	19	26	7
Finance, Insurance, and Real Estate	128	147	3	4	0
Information	57	76	2	2	0
Manufacturing	845	1,370	23	36	14
Other Services	164	203	4	5	1
Professional, Scientific, Management Services	152	157	4	4	0
Public Administration	0	0	0	0	0
Retail Trade	551	264	15	7	-8
Transportation and Warehousing	103	94	3	2	0
Wholesale Trade	107	43	3	1	-2
Total	3,532	3,665	--	--	--

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	5,950
Civilian Employed Population 16 years and over	5,295
Unemployment Rate	10.89
Unemployment Rate for Ages 16-24	36.09
Unemployment Rate for Ages 25-65	6.03

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	685
Farming, fisheries and forestry occupations	270
Service	595
Sales and office	1,235
Construction, extraction, maintenance and repair	505
Production, transportation and material moving	460

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	4,420	89%
30-59 Minutes	380	8%
60 or More Minutes	170	3%
Total	4,970	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	265	50	510
High school graduate (includes equivalency)	1,700	200	580
Some college or Associate's degree	1,520	115	485

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	880	25	130

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	145	45	135	130	125
9th to 12th grade, no diploma	115	110	125	275	225
High school graduate, GED, or alternative	325	620	505	1,365	830
Some college, no degree	485	445	345	700	285
Associate's degree	100	175	100	350	90
Bachelor's degree	145	125	80	285	135
Graduate or professional degree	4	155	155	240	105

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	13,897
High school graduate (includes equivalency)	27,874
Some college or Associate's degree	29,116
Bachelor's degree	42,800
Graduate or professional degree	52,778

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The major employment sectors in Dunkirk include Manufacturing (25% of workers), Education and Health Care Services (19%), Retail Trade (15%) and Arts/Entertainment/Accommodations (14%).

Describe the workforce and infrastructure needs of the business community:

As described in more detail below, many local business owners have difficulty finding qualified applicants for open positions. There is a feeling that many in the local workforce lack the skills and education required by many manufacturing jobs and jobs in other sectors. Further education and job training for the local workforce are crucial to ensuring that our community can remain viable economically.

The northern Chautauqua region has a need to upgrade its transportation infrastructure, including the federal, state, and local highway and bridge system. Beyond that, most infrastructure needs of Dunkirk's business community are adequately met. The region generally has natural gas capacity, electric service capacity, and broadband telecommunications capacity capable of sustaining economic growth. The City of Dunkirk is also undertaking in late 2017 a multi-million-dollar upgrade to its water treatment facility that will further enhance water treatment effectiveness and capacity in our community.

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

The largest anticipated change that will impact Dunkirk economically in the near future is the construction of a pharmaceutical manufacturing facility by the company Athenex in the Town of Dunkirk, directly adjacent to the City's boundary. Construction of this facility is set to begin in 2018. This facility will bring upwards of 450 new jobs to the area once it is fully operational.

The addition of the Athenex facility will introduce a number of new needs to our community, including additional workforce development, infrastructure, and the potential for increased housing demand. The City and partner organizations are working to ensure that these needs are met.

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

According to the Northern Chautauqua Community Foundation's "Regional Profile and Competitive Assessment" report, a relatively low percentage of the blue-collar workforce is judged ready for employment due to lack of training, drug records, or attitudinal factors. There is a feeling among some business owners that the local workforce lacks basic employment skills and advanced technical skills, and a growing perception that despite the existence of significant training resources within the region, there is a shortage of the actual provision of assistance with basic and technical skills training and upgrading.

Some of these concerns regarding the manufacturing workforce, including the lack of basic employment skills, are applicable to the workforce at large. Issues like these can be systemic and difficult to change in a short time frame.

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

A number of local organizations run workforce training initiatives, including Jamestown Community College's North Campus in Dunkirk, Chautauqua Works, Chautauqua Opportunities, Inc. (COI), and SUNY Fredonia. There are also some specialized training schools available locally, including a new regional trade school for high school students that opened in Dunkirk in early 2018.

These efforts will support our Consolidated Plan insofar as they address our second priority need, Economic Development. Creating a better trained and more highly skilled workforce will make our community more competitive for new businesses that may be looking to locate in the area.

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

No

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

Discussion

While Dunkirk's infrastructure is healthy enough to support the local economy, creating a more skilled, educated workforce will likely be necessary for Dunkirk to remain competitive economically. Fortunately, there are a number of strong educational assets locally, including solid public schools, Jamestown Community College, and SUNY Fredonia. There are also workforce training initiatives underway to help improve the local workforce. These assets and initiatives are essential to help Dunkirk remain competitive economically.

MA-50 Needs and Market Analysis Discussion

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

Yes, households with multiple housing problems are concentrated in the neighborhoods surrounding downtown, particularly to the east of downtown.

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

Yes, low-income families in Dunkirk tend to be more concentrated in the neighborhoods surrounding downtown, particularly to the east. While there is some stratification of racial/ethnic groups in Dunkirk, there is no concentration of groups in any one area.

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

The housing market around downtown is generally distressed, particularly in between Central Ave. and Roberts Rd. north of Seventh St. The housing stock is comprised of many older, poorly-maintained homes that are largely lower-cost rentals. The condition of many homes is substandard, both inside and out. Home prices and rents are both low in these areas. (See the attached Dunkirk Market Type map below.)

Are there any community assets in these areas/neighborhoods?

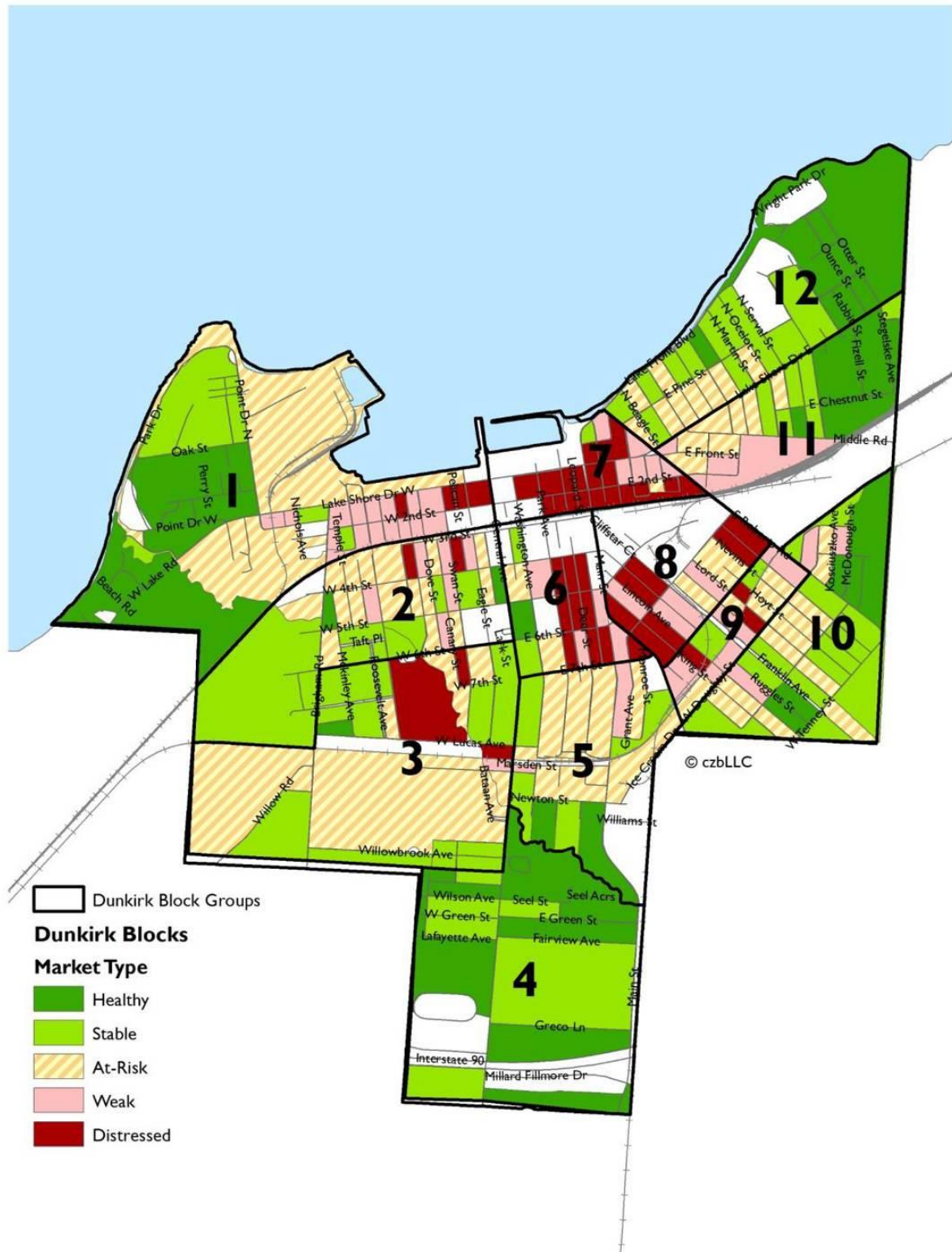
Yes, there are a handful of community assets in our community's distressed housing areas. Primary among them are the Lake Erie shoreline, adjacent to some of these areas, and Washington Park, a large, historic and well-maintained park that provides a valuable amenity to nearby residents. Other assets in these areas include the Public Library, the Dunkirk Historical Society, our downtown business district, and the former Adams Art Gallery.

Are there other strategic opportunities in any of these areas?

Other strategic opportunities in these areas include:

- \$2.5 million in Smart Growth funding from New York State that will help improve the lakefront and the Central Ave. streetscape, which runs through the heart of downtown Dunkirk
- Southern Tier Environments for Living, Inc.'s (STEL) Dunkirk Renovation and Ownership Program, which will add 49 units of affordable rental housing for low-income individuals and families along Main St., right in the center of Dunkirk's most distressed neighborhoods

These opportunities could ideally be leveraged for additional improvements to Dunkirk's most challenged neighborhoods.



Dunkirk Market Type Map

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

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

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

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

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

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

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This Strategic Plan outlines how we hope to address the community development needs presented earlier in our Consolidated Plan. Our goals for the period of time covered by this Consolidated Plan include:

- Provide safe, affordable housing
- Creative economic development solutions
- Provide education programming for students
- Improve pedestrian infrastructure
- Improve community outreach
- Enhanced recreation opportunities

These goals mirror the priority needs outlined below. While meeting these goals will not address every challenge that our community faces, we hope that they will help guide our CDBG efforts in the coming program years to improve our community.

In thinking through geographic priorities for the coming program years, we have reached the conclusion that outlining specific principles rather than outlining specific target areas will provide the most flexible and effective focus of funding allocation for future program years. These principles include:

- leverage existing assets, including parks, the lakefront, public institutions, and other neighborhood-specific amenities
- leverage additional sources of funding
- look for opportunities where CDBG funding can be a catalyst for additional improvements in a particular area
- utilize funds in areas with obvious need - avoid projects in areas where need is not apparent
- invest with measurable outcomes in mind

Over the next few program years, we hope to continue the positive strides we have made in managing our CDBG program as effectively as possible.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	DUNKIRK
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

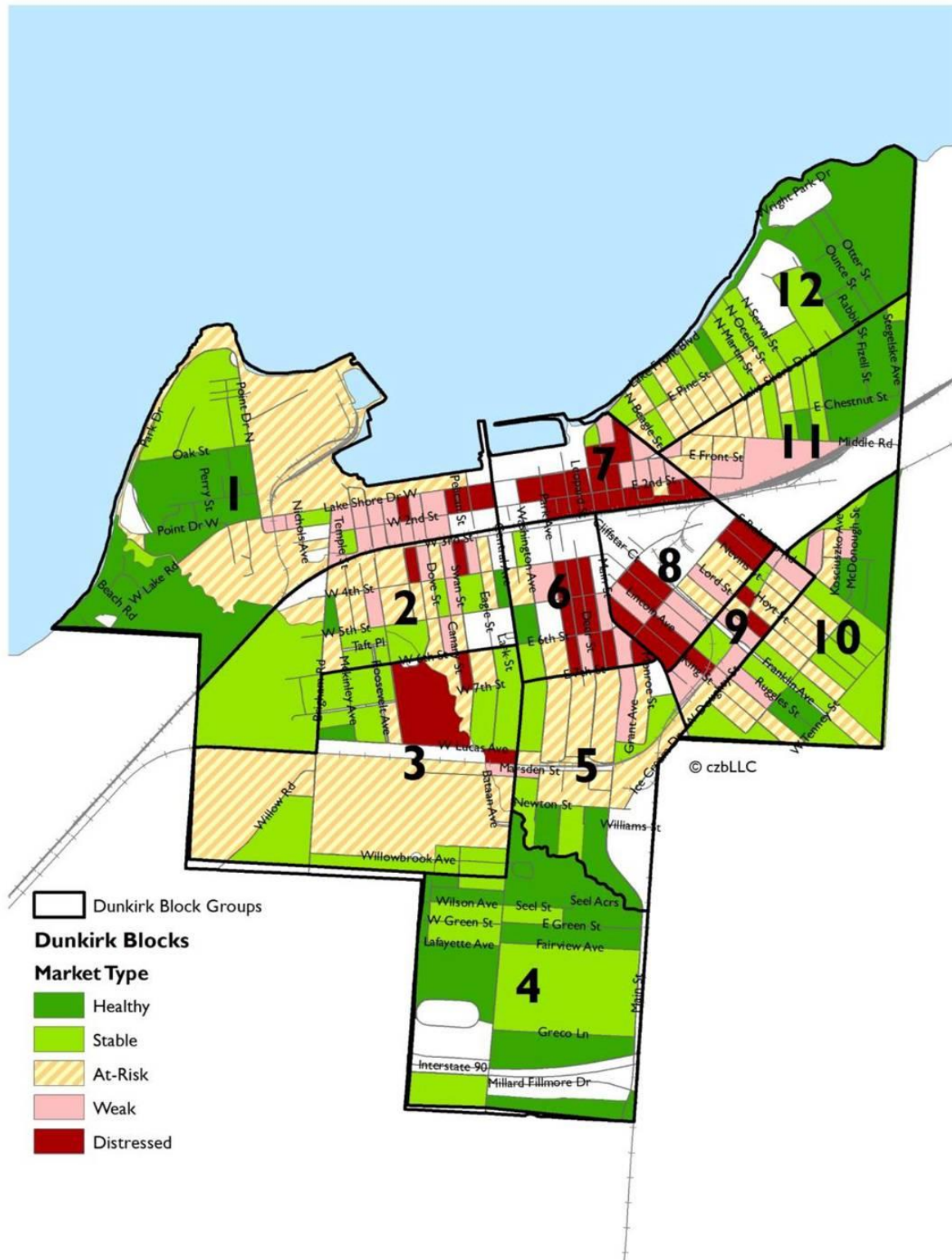
In our analysis of community needs, housing condition, and available Census data, we have determined that areas near downtown face the direst challenges and are most in need of assistance. Specifically, block groups 354-1, 355-2, and 357-3 display highest levels of need. Poverty rates in these blocks groups are estimated to be 46%, 40%, and 46%, respectively. A survey of housing condition in the City showed areas in these block groups to have the most distressed housing stock (see red areas in sections 6, 7 and 8 on attached Housing Market Map).

While we recognize the dire need in the block groups listed previously, we also recognize that areas adjacent to these block groups are currently stable but at a heightened risk of sliding into a worsened state (indicated as yellow areas on the attached map). Many households in these areas are low- to moderate-income and qualify for CDBG assistance. With this in mind, and recognizing that adequate funding is not available to assist with all housing needs, CDBG resources may be targeted effectively to prevent this slide into a worsened state.

In thinking through these facts and reflecting on constraints imposed by arbitrary geographic priorities in the 2013-2017 Consolidated Plan, we have reached the conclusion that outlining specific principles rather than outlining specific target areas will provide the most flexible and effective focus of funding allocation for future program years. These principles are summarized below:

- leverage existing assets, including parks, the lakefront, public institutions, and other neighborhood-specific amenities
- leverage additional sources of funding
- look for opportunities where CDBG funding can be a catalyst for additional improvements in a particular area
- utilize funds in areas with obvious need - avoid projects in areas where need is not apparent
- invest with measurable outcomes in mind

In general, the high level of need in our community relative to the limited availability of funding to address these needs means that difficult decisions will need to be made in regards to where to utilize CDBG funds. With this in mind, we hope to be as strategic as possible in utilizing CDBG funds, following the principles outlined above and thinking carefully about maximizing the impact of available funds.



Housing Market Map

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

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Quality, Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Provide Safe, Affordable Housing

	Description	<p>Quality, affordable housing continues to be an issue for many Dunkirk residents. In our community engagement efforts throughout this planning process, as well as in our consultation with community organizations, housing was the issue that came up more than any other.</p> <p>Specific issues identified included inability to access credit for homeownership, a lack of a homeless shelter, the advanced age of many homes and the related issues of maintenance and utility costs, an increasingly elderly population without the ability to maintain their homes, high levels of lead in homes, and insufficient housing for the homeless, disabled and those with mental health issues. These issues tend to impact minority populations disproportionately.</p> <p>There are a number of organizations in Dunkirk doing great work to provide housing for low-income or otherwise vulnerable populations. But it is clear that housing needs outstrip the ability of local organizations to provide housing.</p>
	Basis for Relative Priority	See above. All available sources of information point to housing as the most pressing need in our community.
2	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Creative Economic Development Solutions

	Description	<p>The foundation of many of the other issues in Dunkirk is a less-than-thriving economy. Like many communities in the region, Dunkirk has suffered from a declining manufacturing base and the failure of other industries to fill that void.</p> <p>The median household income in Dunkirk was estimated to be \$38,937 between 2010 and 2015, lower than the same figure for Chautauqua County, \$42,993, and New York state, \$59,269. The estimated poverty rate in Dunkirk between 2010 and 2015, at 25%, was also higher than the same figure for Chautauqua County, 18.9%, and New York state, 15.7%.</p> <p>Increasing the economic base in the City continues to be a priority. We hope to use available sources of funding in creative ways to improve the perception of Dunkirk and make the city more welcoming to development and new economic opportunities.</p>
	Basis for Relative Priority	As with housing, lack of economic opportunity underpins most of the other challenges facing Dunkirk. For this reason, it is one of our community's top two priority needs.
3	Priority Need Name	Children's Education/After School Programs
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Public Housing Residents Families with Children Unaccompanied Youth
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Provide Education Programming for Students
	Description	<p>The need to create opportunities for Dunkirk's youth is tied to the scarcity of economic opportunities in our community. We feel strongly about providing children in our community the ability to thrive and will provide the necessary resources to make this happen.</p> <p>Children's programs have been a regularly funded CDBG activity in Dunkirk and we intend to continue emphasizing this need.</p>

	Basis for Relative Priority	Youth are one of the most essential resources that any community has to invest in. Dunkirk is no different. Expanding opportunities for the young people in our community will remain a high priority.
4	Priority Need Name	Expanded Community Outreach
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Improve Community Outreach

	Description	There are many Dunkirk residents in need of a variety of community services. An increasingly large percentage of Dunkirk's population is Hispanic. Many of these residents do not speak English, or are otherwise not as engaged in City affairs. In our community outreach efforts for the Consolidated Plan, it was made clear that there are needs surrounding access to resources and information for the Hispanic community, caused in part by language barriers. Because this need has been neglected in the past and to ensure that Dunkirk remains a welcoming, accessible place for all people, we feel that Hispanic outreach should be prioritized for all City programs, including CDBG.
	Basis for Relative Priority	Needs impacting all members of the community are generally higher priorities. But due to the disproportional impact that many community issues have on our Hispanic population and the increasingly large Hispanic population in our community, we feel that the need for increasing community outreach is warranted.
5	Priority Need Name	Infrastructure/Pedestrian Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Families with Children Elderly Elderly Frail Elderly Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Improve Infrastructure/Pedestrian Infrastructure

	Description	<p>In our public outreach process, community observations, and staff conversations throughout this planning process, it has become clear that pedestrian infrastructure in Dunkirk is dire need of repair. Many sidewalks in the city display some wear in the form of cracks and unevenness. At their worst, many sidewalks are impassable for those in wheelchairs, those with strollers and any other community members with more limited mobility.</p> <p>Because Dunkirk is a community where many residents do not have cars and use walking as a primary mode of transportation, we feel that addressing this need is essential. To make our community accessible and livable for all residents, we feel that steps must be taken to improve the condition of our pedestrian infrastructure.</p> <p>We also recognize that myriad other infrastructure in our community is need of maintenance and repair and feel that this is a solid ongoing use of CDBG funds.</p>
	Basis for Relative Priority	While infrastructure is not as a fundamental a need as housing and economic development, it is nonetheless a high priority for our community.
6	Priority Need Name	Recreation Opportunities
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	DUNKIRK
	Associated Goals	Enhanced Recreation Opportunities
	Description	<p>Another theme in our community outreach effort for the Consolidated Plan was the desire for more recreation opportunities. This need was identified for adults and children alike. Many residents would like to see increased indoor and outdoor recreation opportunities, as well as more opportunities for evening recreation.</p> <p>Other residents would like to see additional recreational opportunities for children, in particular opportunities that are safe and accessible to those residents without cars.</p>

	Basis for Relative Priority	While not as fundamental a need a housing, economic development or transportation, recreation is nonetheless important for our community.
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Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Many Dunkirk households rely on Tenant Based Rental Assistance. Given the state of the local housing market and local economy, we anticipate that TBRA will continue to be an important resource for many households.
TBRA for Non-Homeless Special Needs	Southern Tier Environments for Living, Inc.'s (STEL) Dunkirk Renovation and Ownership Program will provide a number of new and rehabilitated housing units in our community, many of which will be targeted towards low-income and/or special needs households.
New Unit Production	Due to the surplus of older housing in Dunkirk and soft housing demand, there has not been a strong market for the production of new units in many years. However, in 2018 STEL will be breaking ground on a project that will construct 11 new buildings housing 29 new apartments (in addition to the rehabilitation of 20 existing units). These units will be a mix of market rate, low-income, and special needs housing.
Rehabilitation	As mentioned elsewhere in this Plan, the housing stock in Dunkirk is old, with many homes having been constructed before 1950. This fact combined with the inability of many homeowners - or unwillingness of many landlords - to afford regular maintenance has created a strong need for home rehabilitation in our community.
Acquisition, including preservation	The soft demand in Dunkirk's housing markets means that the cost to acquire homes in Dunkirk is less than it might be elsewhere, and therefore more families may be able to purchase a home. Homeowner assistance or acquisition programs are likely then to be a viable and effective use of CDBG funds.

Table 49 – Influence of Market Conditions

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

Introduction

Allocation announcements from HUD were made in early May of 2018. The City of Dunkirk was awarded \$480,864 for the 2018 program year, a \$32,701 increase over funding for the 2017 program year. We are hopeful that this increased award amount will maintain for the remaining two program years covered by this plan.

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	480,864	0	0	480,864	961,728	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 50 - Anticipated Resources

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

The 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 2018 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. If City-owned land can be used to help create additional recreation opportunities, this is an option we will strongly consider.

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.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Dunkirk Department of Planning and Development	Government	Economic Development Planning neighborhood improvements	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Dunkirk Department of Planning and Development is responsible for carrying out our Consolidated Plan. The CDBG Administrator, with the support of other department staff, is the primary person tasked with overseeing the City's CDBG program, and therefore the Consolidated Plan. Other local organizations will also be involved in carrying out the Plan, largely in the role of subrecipients for particular activities.

The strengths of our institutional delivery system include dedicated, in-house staffing for our CDBG program, our close relationship with local organizations who are out in our community doing work, and institutional support throughout City Hall.

The weaknesses in our system include a small staff that has experienced turnover and therefore regularly lost institutional knowledge, a limited (but growing) knowledge of/role in on-the-ground programs undertaken by local organizations, and the relatively small number of local organizations available to undertake CDBG programs/projects.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance			
Street Outreach Services			
Law Enforcement	X		

Street Outreach Services			
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			

Table 52 - Homeless Prevention Services Summary

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

There are a number of organizations in Dunkirk that offer health, mental health, and employment services, many targeted to homeless persons and persons with HIV. Southern Tier Environments for Living, Inc. (STEL) provides counseling services and works with area treatment agencies to enable tenants with mental health issues and other special needs to develop the skills necessary to transition to independent living. The Chautauqua County Department of Health and Human Services also provides an array of these services, frequently working with homeless individuals and families, as well as persons with HIV, and directing them to available resources. It is unclear the extent to which these services are used. The Chautauqua Child Care Council, run through Chautauqua Opportunities, Inc. (COI), also offers a variety of child care resources for area residents.

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

The biggest strength of the service delivery system for special needs populations and persons experiencing homelessness is the dedication and expertise of the organizations in our community, like STEL, that are undertaking this work.

The gaps in this system include the availability of resources necessary to meet the community's needs and the awareness in these populations of the resources available to them.

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

Our strategy for overcoming gaps in our institutional structure and service delivery system include:

- 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

Additionally, we will work to create a more proactive project CDBG application process. Currently, our ability to address priority needs is constrained by the projects that are submitted by local organizations. Organizations are generally not consulted regarding needs before the application process begins. Furthermore, the application timeline we have been utilizing does not leave enough time for adequate review of potential projects. By taking a more proactive approach and working with local organizations on potential projects throughout the year, we may be better able to address priority needs.

Lastly, during our public engagement process we were made aware that many Hispanic residents, especially those who are not as proficient in English, struggle to connect with service providers in our community. There may be a number of reasons for this disconnect. We hope to help ameliorate this issue by funding a bilingual center for community services.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Safe, Affordable Housing	2018	2020	Affordable Housing Homeless	DUNKIRK	Quality, Affordable Housing		Rental units rehabilitated: 3 Household Housing Unit Homeowner Housing Rehabilitated: 21 Household Housing Unit Direct Financial Assistance to Homebuyers: 22 Households Assisted
2	Improve Infrastructure/Pedestrian Infrastructure	2018	2020	Non-Housing Community Development	DUNKIRK	Infrastructure/Pedestrian Infrastructure		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	Provide Education Programming for Students	2018	2020	Public Services for Youth	DUNKIRK	Children's Education/After School Programs		Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
4	Improve Community Outreach	2018	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	DUNKIRK	Expanded Community Outreach		Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
5	Creative Economic Development Solutions	2018	2020	Non-Housing Community Development Economic Development	DUNKIRK	Economic Development		Jobs created/retained: 60 Jobs
6	Enhanced Recreation Opportunities	2018	2020	Non-Housing Community Development	DUNKIRK	Recreation Opportunities		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Table 53 – Goals Summary

Goal Descriptions

Consolidated Plan

Dunkirk

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1	Goal Name	Provide Safe, Affordable Housing
	Goal Description	<p>Between 2018 and 2020, we will provide housing assistance in some form to at least 45 low- to moderate-income Dunkirk households.</p> <p><i>Safe, quality, affordable housing for all Dunkirk residents has been identified as a clear need in our community. The need far outweighs our community's ability to improve the situation in a short period of time. For this reason, providing housing opportunities should remain a priority for all of the three program years that this Plan covers, and almost certainly beyond that time as well.</i></p>
2	Goal Name	Improve Infrastructure/Pedestrian Infrastructure
	Goal Description	<p>Between 2018 and 2020, we will make pedestrian improvements in our community that improve the ability of all Dunkirk residents to travel where they need to go. We hope that these improve will positively improve access for 1000 Dunkirk residents. Improvements may include repairs to sidewalks or new walking/biking paths.</p> <p><i>Another need identified throughout the public input process for this plan was improved pedestrian infrastructure. Many Dunkirk residents do not have access to a car for transportation and therefore rely on traveling by foot. There are also many residents in our community with more limited mobility for whom well-maintained pedestrian infrastructure is vital.</i></p>
3	Goal Name	Provide Education Programming for Students
	Goal Description	<p>We will aim to provide educational programming for 300 Dunkirk students over the next three program years.</p> <p><i>Young people are one of the most important resources that any community has, Dunkirk included. We feel strongly about investing resources in youth programming to provide additional learning opportunities. These programs will hopefully give students the tools and inspiration to succeed in their post-high school careers.</i></p> <p><i>In future years, we hope to target some of this education programming to take place during the summer months when children are out of school. Studies have indicated that summer months without schooling are when many students fall behind educationally. Utilizing CDBG funding to prevent this falling behind would be an effective use of our limited resources.</i></p>

4	Goal Name	Improve Community Outreach
	Goal Description	<p>We will aim to reach at least 100 residents each program year for assistance with community services.</p> <p><i>Dunkirk has an increasingly large Hispanic population, many of whom do not have strong English-speaking proficiency. City government in Dunkirk has historically not done well in reaching out to this community and including them in civic efforts. We hope to reverse this trend. Ensuring that the Hispanic population in our community feels included and part of the larger civic conversation will create a stronger, more welcoming community.</i></p>
5	Goal Name	Creative Economic Development Solutions
	Goal Description	<p>We will utilize CDBG funding to help grow Dunkirk's economic base. Between 2018 and 2020, we will help create or retain 60 jobs in the community.</p> <p><i>Where possible, we hope to creatively leverage CDBG funding to improve the vibrancy and economic conditions in our community. While this might include programs like small business loans, we also hope to leverage other public improvements, like streetscapes or public art, to enhance our community and to make it more attractive new businesses and residents. This goal is based on an understanding that many variables, including the arts, can contribute positively to economic development.</i></p>
6	Goal Name	Enhanced Recreation Opportunities
	Goal Description	<p>We will continue to invest in parks and recreation facilities in our community, taking advantage of our existing park system and Lake Erie waterfront. We will also look for new opportunities for recreation, including indoor recreation options.</p> <p><i>The desire for more recreation opportunities in our community came up a number of times during our public outreach efforts. Recognizing that recreation opportunities help create a more livable community, we will look for appropriate opportunities to utilize CDBG funding to enhance recreation opportunities in Dunkirk.</i></p>

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

We estimate that in the three program years covered by this Consolidated Plan - 2018, 2019 and 2020 - CDBG funds will assist 45 low- to moderate-income households with some form of housing assistance.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

In our consultation with the Dunkirk Housing Authority (DHA) during this planning process, 2-3-bedroom accessible units were identified as a need in terms of the availability of units through the DHA. Chautauqua Opportunities, Inc. (COI) also identified accessible units as a need in the community in general.

Activities to Increase Resident Involvements

There are a number of organizations in the area, including Chautauqua Opportunities, Inc. (COI) and Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC), that provide housing services to area residents, including programs to promote home ownership. Given that an increasingly large percentage of public housing residents are Hispanic, ensuring that outreach to promote these services are available in both English and Spanish is essential. Both COI and CHRIC, which have Spanish-speaking staff and informational materials, are in a strong position to ensure this bilingual outreach.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

While the City of Dunkirk will continue to monitor for whether public policies have a negative impact on affordable housing and residential investment, at this time we are not aware of any particular policies that create a negative impact. We will continue to look for opportunities to support affordable housing and residential investment, both of which are sorely needed in the community.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

See above.

SP-60 Homelessness Strategy – 91.215(d)

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

Our strategic plan goals will contribute to reaching out to homeless persons and assessing their individual needs by supporting the organizations like Chautauqua Opportunities, Inc. (COI), our local Continuum of Care coordinator, who work with and house the local homeless population. If there are opportunities to fund programs in future program years that aim to reach homeless persons and assess their individual needs, we will consider those opportunities.

Addressing the emergency and transitional housing needs of homeless persons

Our strategic plan goals will contribute to addressing the emergency shelter and transitional housing needs of homeless persons by supporting the organizations like Chautauqua Opportunities, Inc. (COI), our local Continuum of Care coordinator, who work with and house the local homeless population. If there are opportunities to fund programs in future program years that address emergency shelter and transitional housing needs of homeless person, we will consider those opportunities.

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.

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 homeless persons.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

In future program years we will consider funding any programs aimed at assisting low-income individuals and families avoid becoming homeless. We will also continue to work with local agencies that provide assistance to these individuals and families.

SP-65 Lead based paint Hazards – 91.215(i)

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

We have identified safe, affordable housing as one of the primary needs in our community. With this in mind, we will strongly consider funding for activities that aim to address lead-based paint hazards. We recognize these hazards as one of many ongoing housing challenges in Dunkirk, especially with the advanced age of our housing stock. Addressing lead-based paint hazards will continue to be an important part of the housing rehabilitation activities undertaken with CDBG funds.

How are the actions listed above related to the extent of lead poisoning and hazards?

Due to the advanced age of our city's housing stock and the lack of maintenance in many homes, we suspect that lead may present a hazard in a large number of homes. Our estimates suggest this number is at least 1200 homes, likely more. The extent of cases of lead poisoning is less clear. County-level data indicate that incidences of high blood levels of lead are between two and four times the national rate.

Regardless, as stated above, in future program years we will strongly consider funding for activities that aim to address lead-based paint hazards.

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

The Chautauqua County Department of Public Health is the primary government agency that deals with lead-based paint hazards in our community. The agency has received regular grant funding from HUD over the past number of years for county-wide repair of lead-based paint hazards in rental properties. The agency also performs inspections of properties when children are found or suspected to have lead poisoning, in addition to offering educational resources. According to officials at the Department, incidences of lead poisoning are occurring with greater frequency in Dunkirk and programs aimed to curb this issue will be rolled out in the coming months.

We will continue support the County's lead-based paint programs in Dunkirk in any way we can.

SP-70 Anti-Poverty Strategy – 91.215(j)

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

The most effective way to reduce the number of poverty-level families in Dunkirk is to increase economic opportunities in the community. Economic development is a primary objective in the Planning and Development Department. Among the activities we undertake to increase economic development include:

- Business roundtable meetings, in which City staff convene businesses of various sectors to increase communication and strengthen these sectors
- Helping businesses locate or find additional space in our community
- Seeking out grant opportunities aimed at economic development, where we have been successful securing a number of grants for our community
- Organizing widely attended festivals and events that provide a boost to the local economy

In the past, we have utilized CDBG funding for a small business loan program. We hope to restart this program to help local businesses get off the ground, especially in our downtown business district. We will also look to support and direct residents to local job training programs.

By building Dunkirk's economic base, we hope to provide more job opportunities that can lift families out of poverty.

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

We recognize the direct link between an economic opportunity and affordable housing. Because the City's Planning and Development Department manages both economic development activities and the CDBG program, we will have many opportunities to coordinate these two activities, and will aim to do so where appropriate.

SP-80 Monitoring – 91.230

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

The City of Dunkirk will strive to meet all CDBG requirements regarding activity monitoring.

Measures to ensure compliance of activities with CDBG requirements will include:

- Participating in available webinars, conferences and classes offered by HUD
- Regular review of printed CDBG guides
- Regular communication with HUD staff
- Regular communication with subrecipients, including the collection of progress reports
- Monitoring visits with subrecipients
- Continued improvement of subrecipient agreements to ensure that CDBG requirements are clearly communicated
- Site visits to ensure projects/programs are carried out following CDBG requirements
- Closely adhering to Citizen Participation Plan to ensure public comment requirements are followed

Expected Resources

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

Introduction

Allocation announcements from HUD were made in early May of 2018. The City of Dunkirk was awarded \$480,864 for the 2018 program year, a \$32,701 increase over funding for the 2017 program year. We are hopeful that this increased award amount will maintain for the remaining two program years covered by this plan.

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	480,864	0	0	480,864	961,728	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 54 - 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 2018 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. If City-owned land can be used to help create additional recreation opportunities, this is an option we will strongly consider.

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

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: \$196,000	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 7 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: \$134,864	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	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: 120 Persons Assisted
4	Improve Community Outreach	2018	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	DUNKIRK	Expanded Community Outreach	CDBG: \$50,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted Facade treatment/business building rehabilitation: 1 Business
5	Enhanced Recreation Opportunities	2018	2020	Non-Housing Community Development	DUNKIRK	Economic Development	CDBG: \$34,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

Table 55 – Goals Summary

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 four activities:</p> <ul style="list-style-type: none"> • CHRIC's Closing Cost and Down Payment Assistance Program • CHRIC's Roof Repair Program • CHRIC's Acquisition/Rehab/Resale Program • COI's Rental Rehabilitation at 539 Washington Ave.
2	Goal Name	Improve Infrastructure/Pedestrian Infrastructure
	Goal Description	This program year we will address pedestrian infrastructure through a sidewalk repair and replacement program in the city's 3rd and 4th wards.
3	Goal Name	Provide Education Programming for Students
	Goal Description	This program year we will address the goal of providing education programming for students by funding programs through the Boys and Girls Club of Northern Chautauqua County and Chautauqua Striders.
4	Goal Name	Improve Community Outreach
	Goal Description	This program year we will address community outreach by helping fund a new bilingual center for community outreach.
5	Goal Name	Enhanced Recreation Opportunities
	Goal Description	<p>This program year we will fund two activities that are intended to help foster economic development:</p> <ul style="list-style-type: none"> • Public Art • Adams Center for Collaborative Design <p>We are also aiming to reactivate a small business loan program that has existing funding through the CDBG program.</p>

Projects

AP-35 Projects – 91.220(d)

Introduction

9.21.23 Amendment PY18,19,20,21,22 reallocates (\$120,734.01) unspent funds (includes CV Funds) from forfeited and reprogrammed projects. This reallocation includes: PY19 CHRIC Rehab & Resale (\$40,000.00) and PY20 CHRIC Rehab & Resale (\$30,000.00) reprograms to: A newly created PY19 CHRIC Rehab & Resale project (New Total \$70,000.00) which will be used to purchase & resale a property for resale to 1 new LMI homeowner and have a duration of 2 years. PY18 H.O.P.E. Community Center Rehab & Services (\$13,595.32) and PY21 City of Dunkirk Sidewalk Repair & Replacement (\$7,584.00) reprograms to: An existing PY22 City of Dunkirk Senior Center Improvements project (Original Total \$24,408.18) (Updated Total \$45,587.50) which will be used to create a new, safe sidewalk access for seniors at the Farmer's Market Pavilion area. PY19 H.O.P.E. Community Center Rehab & Services (\$20,745.15) reprograms to: A new PY19 City of Dunkirk Wright Park Safe Access Walkways project (New Total \$20,745.12) which will be used to repair upheaved paved walkways that access Wright Park, create a new paved path to provide access from the Southern neighborhood to the park, along with install solar lighting for the safety of the city pedestrians. PY19 C.O.I. Rental Assistance project (\$24,554.60 CV Funds) and PY20 Access for the Arts Adams Center Renovations project (\$5,000.00) reprograms to: An existing PY22 Washington Park Improvements (Original Total \$12,000.00) (Updated Total \$41,554.69) which will be used to purchase & install a new spray pad water feature, fix the drinking fountain, and update electric to aid in outdoor activities for the prevention of coronavirus.

September, 2020 amendment reallocates \$15,360 from Sidewalk project to 2019 Pier Improvements project

PY18 Public Art Project reprogrammed to PY19 Pier Improvements project.

Our selection of projects for the 2018 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 November 6, 2017. 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 December 4, 2017. In total, 15 applications were received. 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. Because the Comprehensive Plan was still being drafted as applications were being submitted, applicants did not have the guidance of the Plan to inform their submittals. We hope that in the 2019 and 2020 program years, there will be better coordination between City staff and potential applicants in matching project proposals to the needs and goals identified in the Comprehensive Plan. 5/7/2019 amendment was made to reduce sidewalks project by \$45,285.00 to be moved to 2017 Seel Street. This reduces the sidewalk project budget to \$89,579.00.

Projects

#	Project Name
1	Owner-Occupied Roof Repair
2	Boys and Girls Club Career Explorers
3	HOPE Center for Community Services
4	Program Administration
5	Chautauqua Striders Dunkirk Programs
6	Rental Based Rehabilitation Program
7	Down Payment and Closing Cost Assistance
8	Sidewalk Repair and Replacement Program
9	Acquisition/Rehab/Resale Program
10	Public Art Installation
11	Adams Center for Collaborative Design

Table 56 – Project Information

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

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

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

We acknowledge that there is an imperfect match between our selected projects for 2018 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	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
2	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 facias 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.
	Project Name	Boys and Girls Club Career Explorers
	Target Area	DUNKIRK
	Goals Supported	Provide Education Programming for Students
	Needs Addressed	Children's Education/After School Programs
	Funding	CDBG: \$15,000

	Description	Career Explorers aims to align career interests with real-life work experiences for Club members ages 14-18. It also seeks to provide opportunities for younger members to explore options in STEAM (Science, Technology, Engineering, and Math) related careers by providing them early exposure and hands-on, experiential learning opportunities in after school and summer programming.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The Boys and Girls Club of Northern Chautauqua County will work with community partners to deliver Career Explorers to local youth aged 6-18. Club members will develop a career plan project, research various professions, meet professionals in careers of interest, and will be exposed to a variety of traditional and non-traditional career path options. Field trips to local educational institutions and businesses will be part of programming. Club members will also be provided opportunities to improve writing, grammar, spelling and math in fun and interactive activities.
3	Project Name	HOPE Center for Community Services
	Target Area	DUNKIRK
	Goals Supported	Improve Community Outreach
	Needs Addressed	Expanded Community Outreach
	Funding	CDBG: \$50,000
	Description	This project's unspent funds (\$13,595.32) were willfully forfeited and are being reprogrammed, along with PY21 City of Dunkirk Sidewalk Repair (\$7,584.00) to PY22 Senior Center Improvements, making the new total of the PY22 Senior Center Improvements (\$45,587.50.) Funding will be used to acquire/rehabilitate a dedicated space for the local non-profit Hispanic Organized for Progress and Education (HOPE), out of which public services will be offered.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Projects funds will be used to acquire, rehabilitate, and/or furnish a new space for HOPE. Funds will also be used for staffing and administrative costs to provide outreach services to the community, with a focus on Dunkirk's Hispanic community.
4	Project Name	Program Administration
	Target Area	DUNKIRK
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$36,000
	Description	This activity will fund staffing to administer the City's CDBG program.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This project will cover all administration activities for Dunkirk's CDBG program, including managing program funds, preparing plans, communicating with subrecipients, conducting public outreach, ensuring program regulations are followed, et al.
5	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 Dunkirk Community Based Tutoring and Life Skills Education in Dunkirk elementary schools during the school day, Strides for STEAM at Dunkirk Middle School, and Summer STEAM Stations during Dunkirk community events.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	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 • Strides 4 STEAM program that encourages girls enrolled in Dunkirk middle school to pursue careers in Science, Technology, Engineering, Arts and Math
6	Project Name	Rental Based Rehabilitation Program
	Target Area	DUNKIRK
	Goals Supported	Provide Safe, Affordable Housing

	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$57,000
	Description	Chautauqua Opportunities, Inc. will rehabilitate the 2nd-floor unit of a house at 539 Washington Street to make available for rental to a low-to-moderate income family.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	COI will rehabilitate the 4-bedroom, 2nd floor apartment at 539 Washington, which is currently vacant, to make it available for rental to a low- to moderate-income family. The unit is currently in poor condition and requires substantial rehabilitation to be occupied. COI, which owns the property, intends to subcontract rehabilitation work to a general contractor to complete the work within one year of signing a contract with the City. Rehabilitation work will likely include: lead abatement, new floors, new kitchen appliances and cabinetry, fresh paint, updated windows and door, and other improvements.
7	Project Name	Down Payment and Closing Cost Assistance
	Target Area	
	Goals Supported	Provide Safe, Affordable Housing
	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$30,000
	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	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	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.
8	Project Name	Sidewalk Repair and Replacement Program
	Target Area	DUNKIRK
	Goals Supported	Improve Infrastructure/Pedestrian Infrastructure
	Needs Addressed	Infrastructure/Pedestrian Infrastructure
	Funding	CDBG: \$74,219
	Description	September, 2020 amendment reallocates \$15,360 from Sidewalk project to 2019 Pier Improvements project*****Project will aim to repair/replace sidewalks in high-need neighborhoods near Public School #3 in Dunkirk's 3rd and 4th wards.5/7/2019 amendment was made to reduce sidewalks project by \$45,285.00 to be moved to 2017 Seel Street. This reduces the sidewalk project budget to \$89,579.00.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	Department of Public Works (DPW) staff will map out and identify those areas where sidewalk repair is most needed and will be most beneficial. DPW will then contract to have sidewalks repaired or replaced, where appropriate.
9	Project Name	Acquisition/Rehab/Resale Program
	Target Area	DUNKIRK
	Goals Supported	Provide Safe, Affordable Housing
	Needs Addressed	Quality, Affordable Housing
	Funding	CDBG: \$45,000
	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	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	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.
10	Project Name	Public Art Installation
	Target Area	

	Goals Supported	Enhanced Recreation Opportunities
	Needs Addressed	Economic Development
	Funding	CDBG: \$10,000
	Description	This project (\$10,000) was cancelled, and funding was reprogrammed to PY19 Pier Improvements. The City of Dunkirk Planning and Development Department will coordinate the installation of public art on City-owned property.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	<p>Project cancelled in September, 2020</p> <p>*****</p> <p>The Planning and Development Department will consult with local/regional arts agencies to determine the most effective way to utilize these funds for maximum impact. We will research effective public arts installations in other communities to help determine the most appropriate and effective installation option for our own community.</p>
11	Project Name	Adams Center for Collaborative Design
	Target Area	DUNKIRK
	Goals Supported	Enhanced Recreation Opportunities
	Needs Addressed	Recreation Opportunities
	Funding	CDBG: \$24,000
	Description	Provide funding to repair the failing roof or other rehabilitation of the future Adams Center for Collaborative Design.
	Target Date	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Funds will be utilized to stabilize the failing roof of the former Adams Art Gallery or, if the roof is determined to be in adequate condition, to perform other rehabilitation to move the building towards usability.

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 2018 program year, CDBG assistance will be directed to those area 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 sidewalk repair and replacement program, housing rehabilitation, a facility for bilingual outreach services, and improvements to the former Adams Art Gallery.

Geographic Distribution

Target Area	Percentage of Funds
DUNKIRK	100

Table 57 - 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 make 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	15
Total	15

Table 58 - One Year Goals for Affordable Housing by Support Requirement

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

Table 59 - 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
- Chautauqua Opportunities, Inc.'s (COI) Rental Based Rehabilitation 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 is 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
- Chautauqua Opportunities, Inc.'s (COI) Rental Based Rehabilitation 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(l)(1,2,4)

Introduction:

N/A

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	85.00%

N/A

Attachments

Citizen Participation Comments



HON. MAYOR WILFRED ROSAS

Summary of Citizen Participation Comments City of Dunkirk 2018-2020 Consolidated Plan - Community Development Block Grant (CDBG) Program Completed May 29, 2018

Process

In preparing this plan, we made a strong effort to gather wide input from the Dunkirk community and utilize the knowledge and expertise of the organizations that are actively working in our community. We held a number of public meetings throughout the City to discuss the CDBG program and to gather input on community needs. These meetings were held at City Hall, the Dunkirk Farmers Market, the Dunkirk Public Library, the Fredonia Technology Incubator, the community room at the Dunkirk Housing Authority's Court Apartments. The meetings enabled us to reach a wide swath of Dunkirk residents for their input.

We also consulted with a number of local organizations that possess a deep knowledge of the community and its needs. These organizations included Chautauqua Home Rehabilitation and Improvement Corp. (CHRIC), Chautauqua Opportunities, Inc. (COI), the Chautauqua County Department of Health and Human Services, Revitalize Dunkirk, Hispanics Organized for Progress and Education (HOPE), Southern Tier Environments for Living, Inc. (STEL), the Dunkirk Housing Authority, and the Northern Chautauqua Community Foundation (NCCF). These organizations were instrumental in providing information on the state of our community and its most pressing needs.

A draft version of this Plan was made available to the public for a thirty-day comment period on December 20, 2017, and a public hearing was held on January 8, 2018. At this public hearing, one attendee suggested that the priority needs listed in the plan could be more specific, pointing to "Economic development" as one need that could benefit from greater clarity. No other comments specific to the Consolidated Plan were received before the comment period closed after January 18, 2018.

A revised draft version of the Consolidated Plan was made available to the public for a thirty-day comment period on April 16, 2018, and a public hearing was held on that same day. Only one resident attended this public hearing and although he had a few questions, made no comments on the plan. No other comments were received before the public comment period closed on May 16, 2018.

Summary of Comments

A number of themes emerged from the public comments we gathered during our planning process, primarily addressing Dunkirk's most pressing community needs. These themes included the need for:

- Affordable, quality housing for all Dunkirk residents
- Improved pedestrian infrastructure
- Enhanced economic opportunities/job training
- Enhanced recreational opportunities



HON. MAYOR WILFRED ROSAS

- Better outreach to diversity of residents

This input, combined with the other information gathered during this planning process, helped inform the priority needs identified in the Plan.

Some specific examples of the comments that comprised the aforementioned themes included:

- The condition of rental housing was raised at one meeting: according to Chautauqua Opportunities, Inc., 46% of Section 8 housing inspections in Dunkirk fail the first time
- At another meeting, the poor condition of many city sidewalks was echoed by a number of participants, who pointed to the fact that many residents travel on foot or bicycle using the sidewalks as their primary mode of transportation
- There was a lengthy discussion at our public meeting at Dunkirk Housing Authority apartments about the need more outreach and accessibility related to available service programs from the City and local non-profits, especially for those residents who do not speak English proficiently

Other specific comments on these themes as well as other topics can be found in the Citizen Participation section of the Consolidated Plan.

Comment not Accepted

A number of community members expressed the need for more and better transportation options for Dunkirk residents, especially low-income residents. While we acknowledge that this need is legitimate, public transportation is unfortunately not an activity that can be funded through the CDBG program. These comments therefore are not reflected in the remainder of this Consolidated Plan.

At one public meeting, a number of comments were made regarding very specific infrastructure issues in specific parts of the City. While these comments are appreciated and the general thrust of the comments has been noted, many of the specific issues raised were too narrow in scope for consideration for CDBG funding.

At another public meeting, attendees had comments on many other community issues that were only tangentially related to the Consolidated Plan. These comments were recorded but will not be reflected in the Plan.

All other comments received during the plan's citizen participation process were accepted.

Grantee SF-424's and Certification(s)

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424			
*1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
*3. Date Received: 09/30/2020		*4. Applicant Identification: N/A	
5a. Federal Entity Identifier: 000		5b. Federal Award Identifier: N/A	
State Use Only:			
6. Date Received by State:		7. State Application Identifier: 000	
8. APPLICANT INFORMATION:			
*a. Legal Name: City of Dunkirk			
*b. Employer/ taxpayer Identification Number (EIN): 13-6002500		*c. Organizational DUNS: 0901750200000	
d. Address:			
* Street: 900 Central Avenue			
Street2:			
* City: Dunkirk			
County/Parish:			
* State: NY: New York			
Province:			
* Country: USA: UNITED STATES			
* Zip + Postal Code: 14048-2102			
e. Organizational Unit:			
Department Name: Planning and Development		Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: Mr.		* First Name: Andrew	
Middle Name:			
* Last Name: Vukobratovic			
Suffix:			
Title: Planning and Development Director			
Organizational Affiliation: City of Dunkirk			
* Telephone Number: 716-265-6174		Fax Number:	
* Email: avukobratovic@cityofdunkirk.com			

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/> Type of Applicant 2: Select Applicant Type <input type="text"/> Type of Applicant 3: Select Applicant Type <input type="text"/> * Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="Housing and Urban Development (HUD)"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.018"/> CFDA title: <input type="text" value="Community Development Block Grant/Other Related Programs"/>	
* 12. Funding Opportunity Number: <input type="text" value="N/A"/> * Title: <input type="text" value="N/A"/>	
13. Competition Identification Number: <input type="text" value="N/A"/> Title: <input type="text" value="N/A"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="2016-2021 Consolidated Plan and 2016 Annual Action Plan for City of Dunkirk, NY HUD Project"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
15. Congressional Districts Of:	
*a. Applicant: <input type="text" value="NY-27"/>	*b. Program-Project: <input type="text" value="EY-27"/>
Attach an additional list of Program-Project Congressional Districts if needed. <div style="display: flex; justify-content: space-between; align-items: center;"> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
17. Proposed Project:	
*a. Start Date: <input type="text" value="04/01/2018"/>	*b. End Date: <input type="text" value="03/31/2019"/>
18. Estimated Funding (\$):	
*a. Federal	<input type="text" value="480,854.00"/>
*b. Applicant	<input type="text" value="0.00"/>
*c. State	<input type="text" value="0.00"/>
*d. Local	<input type="text" value="0.00"/>
*e. Other	<input type="text" value="0.00"/>
*f. Program Expense	<input type="text" value="0.00"/>
*g. TOTAL	<input type="text" value="480,854.00"/>
*19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. The application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <div style="display: flex; justify-content: space-between; align-items: center;"> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001) <input checked="" type="checkbox"/> I AGREE <small>* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text"/> Middle Name: <input type="text"/> Last Name: <input type="text" value="Mazzoni"/> Suffix: <input type="text"/> Title: <input type="text" value="Mayor"/> Telephone Number: <input type="text" value="518-356-4000"/> Fax Number: <input type="text"/> Email: <input type="text" value="mayor@cityofdunkirk.com"/>	Signature of Authorized Representative: <input type="text" value="Signed, Nickol Mazzoni"/> Date Signed: <input type="text" value="05/04/2018"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4945-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0345-0042), Washington, DC 20503.

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

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

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

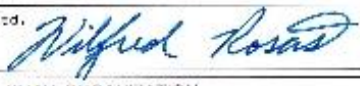
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the completed work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.
8. Will comply with the intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1581-1685, and 1685-1696), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§502 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290d-3 and 290ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

11. Will comply or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1505 and 1724-1728) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a-276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11958; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1966 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§459a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-123, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Signed: 	Name: _____
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Dunkirk, NY	06/14/2018

SF 424D (Rev. 7-97) Back

CERTIFICATIONS

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

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

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

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

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

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

6/04/2018
Date


Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2018 (a period specified by the grantee of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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


Signature of Authorized Official

6/04/2018
Date

MAYOR
Title

Appendix - Alternate/Local Data Sources

1	Data Source Name United States Census Bureau
	List the name of the organization or individual who originated the data set. U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, County Business Patterns, Economic Census, Survey of Business Owners, Building Permits, Consolidated Federal Funds Report, Census of Governments Last Revised: Thursday, 10-Jan-2013 10:40:20 EST
	Provide a brief summary of the data set. The data set used from the U.S. Census Bureau includes information on socioeconomic conditions within the City of Dunkirk, as well as geographic information, and business information.
	What was the purpose for developing this data set? The United States Census Bureau develops this data set in order to provide accurate and useful information for researchers and municipalities around the United States.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data set is a fair and accurate representation of the population and socioeconomic situation within the City of Dunkirk.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? The City of Dunkirk strives to use the most recent and accurate data available. Keeping this in mind, much of the Census information used to formulate the City of Dunkirk's plan was found from the 2010 census. Additional American Community Survey data is as recent as 2012.
	What is the status of the data set (complete, in progress, or planned)? The census data set used to develop this plan is complete and accurate.