



2021 DRAFT Annual Action Plan

Town of Babylon, New York

February 2021

**Town of Babylon
Supervisor Rich Schaffer**

Department of Community Development
200 E. Sunrise Highway
Lindenhurst, New York 11757

AP-05 Executive Summary	
1. Introduction.....	3
2. Summary of Objectives and Outcomes identified in the Plan.....	3
3. Evaluation of past performance.....	4
4. Summary of Citizen Participation process and consultation process.....	6
5. Summary of Public Comment.....	7
6. Summary of Comments or views not accepted and the reasons for not accepting them...11	
7. Summary.....	11
PR-05 Lead & Responsible Agencies – 91.220(b).....	23
AP-10 Consultation – 91.100, 91.200(b), 91.215(I).....	25
AP-12 Participation – 91.105, 91.200(c).....	27
AP-15 Expected Resources – 91.220(c)(1,2).....(HOME MATCH).....	28
AP-20 Annual Goals and Objectives – 91.420, 91.220 (c)(3) & (e).....	35
AP-35 Projects CDBG.....	41
HOME.....	42
AP-38 Project Summary.....	44
AP-50 Geographic Distribution – 91.220(f).....	44
AP-55 Affordable Housing – 91.220(g).....	47
AP-60 Public Housing – 91.220(h).....	48
AP-65 Homeless and Other Special Needs Activities – 91.220(i).....	49
AP-75 Barriers to Affordable Housing – 91.220(j).....	50
AP-85 Other Actions – 91.220(k).....	51
AP-90 Program Specific Requirements – 91.220(l)(1,2,4).....	54
Maps: Cost burdened Households by Census Tract.....	60
Minority Population Share by Census Tract.....	61
Application for Federal Assistance SF-424 Forms.....	64
Certifications.....	70

Executive Summary

AP-05 Executive Summary

1. Introduction

As a recipient of federal grant funds, the Town of Babylon is required by HUD to prepare a Consolidated Plan and Annual Action Plan. These plans serve as the application for funding for the following federal entitlement programs serving low-income individuals and/or families:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships Act Program (HOME)

The Town's Five-Year Consolidated Plan covers the period from January 1, 2020 through December 31, 2024 and identifies the community's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them.

In 2021 the Town of Babylon is anticipating receiving \$1,092,943.00 of CDBG funding; and \$442,411.00 in HOME funding.

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

During the development of the Consolidated Plan, a number of needs were identified. The funding priorities and guidelines for addressing these needs are summarized below:

Funding Priorities and Guidelines

- High priorities are those activities that will be considered for funding with the CDBG/HOME allocation during the five-year consolidated plan period of 2020 through 2024 prior to low priority projects.
- Low priorities are those activities that will be considered for funding with CDBG/HOME funding during the five-year consolidated plan period of 2020 through 2024 after the consideration of high priorities.
- The Town will consider providing certification of consistency and supporting applications submitted by other entities for non-Town funds for projects not funded with CDBG or HOME funding during the five-year consolidated plan period of 2020 through 2024.

Infrastructure Improvements

- Funding for non-housing community development proposals that include but is not limited to the following: eliminate a threat to public health and safety to include water/sewer improvements, flood/drainage improvements, sidewalk improvements, street improvements including street-scaping, lighting, beautification projects/tree planting, and other improvements.

Public Facility Improvements

- Fund public facility improvements that benefit low income households and persons, persons with special needs, senior centers, neighborhood facilities, youth centers, childcare centers, health facilities, handicapped centers, homeless facilities, abused and neglected children facilities, parks, community gardens, recreational facilities, and other facilities.

Clearance and Demolition

- Fund projects that propose the clearance or demolition of buildings.

Section 108 Loan Repayment

- Repayment of principal for Section 108 loan guarantee.

Housing Rehabilitation

- Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs.
- Offer homeowner housing maintenance education.

Access to Affordable Housing

- Fund projects that propose the acquisition, rehabilitation, and new construction of real property to be developed for a public purpose.

Rehabilitation for Publicly or Privately Owned Commercial/Industrial

- Fund rehabilitation of commercial/industrial property limited to exterior improvements (façade improvements) and the correction of code violations.

Public Services

- Fund projects that provide supportive services to low and moderate income households as well as persons with special needs.
- Support efforts to develop a regional social service collaborative to coordinate the work of social service organizations, disseminate news and information, and eliminate duplication of effort.

3. Evaluation of past performance

In FY 2020, the Town has provided CDBG, and HOME funds to expand affordable housing options, repay Section 108 Loan, and fund infrastructure and facility improvements in the Villages and the Town. Through the CDBG grant program the Town funded public service programs which included services such as Housing Counseling, Literacy Training, Youth programs, Fair Housing advocacy, Food Banks, etc. Additionally, the Home Improvement Program was run using CDBG funds. HOME funds were used for down payment assistance and construction of new homes for both rental occupancy and homeownership. On March 27, 2020, the Town of Babylon also received funding through The Coronavirus Aid, Relief and Economic Security Act (CARES Act). This funding was used to provide grants to agencies to help prevent, prepare for, and respond to coronavirus (COVID-19).

WILL BE UPDATED ON THE FINAL PLAN SUBMISSION

The *Wyandanch Rising project* is a revitalization effort to improve the hamlet of Wyandanch. Since 2002 this project has resulted in infrastructure and park improvements, construction of new rental units, and a new Head Start facility. These projects are consistent with the Wyandanch Hamlet Plan, which identified the community’s desire to redevelop the downtown area into a pedestrian friendly mixed-use development.

In 2016 the Town completed work on Wyandanch Plaza, the one-acre public space at the heart of the Wyandanch redevelopment area, adjacent to the Wyandanch Train Station. The Plaza includes an ice rink, which has seen an increase in use every year since it opened in December 2016. The Plaza and Ice Rink were funded with a combination of State, County and Town funds.

In 2018, the Town engaged in planning, and development activities on three new buildings at Wyandanch Rising: Building C at 20 Station Drive, Buildings E and E3 at 1 Washington Avenue, and the Liner Building at 11 Park Drive. Building C will be a health and wellness services building, consisting of the relocated HRH health center, and a YMCA. This building is now in the design phase and should have a construction date of 2019. Building E is a new 124 unit apartment building in construction slated for completion in the first quarter of 2020. E3, a smaller building next to Building E, will be home to the new Wyandanch Resource Center. The Liner Building at 11 Park Drive is proposed to be a 94-unit residential senior living home that will be operated by the non-for-profit Selfhelp.

Construction of the new LIRR Wyandanch train station, platforms and double track were completed in the late summer of 2018.

Resulting from a series of community meetings in 2010, the Town is continuing their revitalization effort in *North Amityville* to support economic and community development goals. The goals may be achieved through mixed-use development focused at the intersection of Albany Avenue and Great Neck Road.

The Town is working with a Master Developer, Summit Realty, on redeveloping the intersection of Great Neck Road and Albany Avenue. Following the successful renovation of a former Rite Aid to host a new Dollar Tree, Summit Realty has an approved 5000 SF commercial pad site and currently an approximate 10,000 SF commercial center under review by the Town. The developer has identified a number of potential tenants and continues to vet concepts with the community's revitalization Implementation Committee.

Recognizing that North Amityville is in need of a comprehensive redevelopment, especially in the downtown area; around the intersection of Albany Avenue and Great Neck Road, the Town spearheaded the North Amityville Revitalization process. A Vision Plan that was developed through a series of community and stakeholder meetings, represents the community's vision and goals for the intersection and is intended to outline the organization, promotion and economic growth of the study area. The visioning process, an essential element of community planning, encourages public participation and enables community members to collectively envision the best redevelopment opportunities for the study area. It also helps to build consensus among a diverse group of stakeholders.

North Amityville is one of the fastest growing areas within the Town of Babylon. The hamlet is comprised of eight percent of the Town's total population.

Also, the vision plan for *Copiague* is being implemented to improve downtown Copiague area. 2016 witnessed groundbreaking on the first development in the new Downtown Copiague (DC) Zoning District. Copiague Commons is a 90 unit residential development in two four-story, 45-units buildings on Railroad Avenue, steps away from the Copiague Train Station. Copiague Commons opened in September 2017.

The Town has developed an ambitious downtown streetscape and façade improvement program to be funded by over \$300,000 in grants from Empire State Development, Suffolk County Department of Economic Development and Planning, New York State Homes and Community Renewal (Main Street Program) and the New York State Assembly, as well as from developer fees and Town funds. Working with building owners throughout the DC district, the Town received five applications to participate in its façade program. Using funds from developer fees, each applicant will receive up to \$25,000 to assist in implementing improvements to the exteriors of these businesses. The program is ongoing, and two new facades have been completed.

Finally, construction documents for pedestrian improvements to Great Neck Road and downtown cross streets were completed at the end of 2017. Designed as a three phase project, the first phase of new crosswalks, improved sidewalks, and new curbing was completed in the summer of 2018, with the second phase to begin in the spring of 2019.

The 2019 Annual Action Plan will continue to follow the basic parameters of the previous year's plans but with more emphasis on the physical nature of revitalization activities and the addition or improvement of public facilities and infrastructure. In the past, infrastructure improvements (curb and sidewalks) addressed a significant need and complemented other activities/programs funded with non-federal dollars. As these non-federal resources became scarce and programs ended, a stronger and more direct emphasis towards neighborhood revitalization with CDBG and HOME funds will occur. It should be noted that since 2010, CDBG and HOME funds have received cuts resulting in fewer completed projects and a decrease in the number of households assisted.

On February 15, 2019 the President signed Public Law 116-6, which includes Fiscal Year 2019 funding for the Office of Community Planning and Development's formula programs, which provide funding for housing, community and economic development activities, and assistance for low-and moderate-income persons and special needs populations.

4. Summary of citizen participation process and consultation process

To implement an effective process for the Annual Action Plan, the Town of Babylon followed the subsequent general citizen participation process. Two hearings were held, both of which were open to the general public with notices of the public hearings published in the Suffolk Edition of Newsday, the leading regional daily newspaper, Noticia News, and Able Newspaper. The notices in English and Spanish were posted on the Town's website and mailed to a list of interested parties. Fliers were mailed to Agencies receiving CDBG and HOME funds to post. The Town Clerk's Office, Town libraries were mailed a copy of the draft plan and fliers English and Spanish to post.

Overview of the Citizen Participation Process:

During the year, two public hearings are held. The first seeks to understand the needs of the community and to solicit proposals from local agencies who are interested in providing services and implementing the priorities outlined in the Consolidated Plan for the following year. Proposals are generally due to the Town at the end of November / early December. Upon request, the Town provides assistance to nonprofit organizations to develop proposals that benefit low/moderate, low, very low, and poverty income groups. The Town then prepares the draft plan based on input from the public as well as the proposals received. Once the draft plan is prepared, it is made available to the public for comment for a minimum of 30 days. During the comment period a second public hearing is held to present the draft plan to the public. Public notifications are done similarly to the

process outlined above. Paper copies of the draft plans are made available to the public at local libraries, the Town Clerk's office and the office of the Department of Community Development. Additional copies are made available upon request. The proposed Annual Action Plan then will incorporate recommendations for funding of proposals received as well as consider any public comments received on the draft plan. Comments are taken for at least thirty days, and are considered when developing the final Annual Action Plan.

The finished Annual Action Plan will be submitted to HUD after final grant allocations are released from HUD. Copies of the approved final plan will be made available to the public at the same locations listed above. A summary of comments received on the proposed plan are included in the plan. Amendments to the Annual Action Plan will only be made after completion of the public comment period of no less than 30 days typically, unless required, no more than 35 days.

Public notice fliers in English and Spanish are mailed to the persons on a database maintained in-house. The mailing list includes all current agencies receiving CDBG and HOME funds as well as anyone else indicating an interest in being on the mailing list. Notices and draft documents are posted on the Town's website.

Access to information and opportunity to comment - Copies of the draft and final Housing and Community Development Plans, draft and final Comprehensive Annual Performance & Evaluation Reports (CAPER), and all other appropriate supporting documents are available in the following locations during regular business hours:

- Town of Babylon Department of Community Development – 200 East Sunrise Highway, Lindenhurst, NY 11757
- Town of Babylon Town Clerk's Office – 200 East Sunrise Highway, Lindenhurst, NY 11757
- Amityville Public Library – Corner of Oak & John Street, Amityville, NY 11701
- Babylon Public Library – 24 South Carl Avenue, Babylon, NY 11702
- Copiague Memorial Public Library – 50 Deauville Blvd., Copiague, NY 11726
- Deer Park Public Library – 44 Lake Avenue, Deer Park, NY 11729
- North Babylon Public Library – 815 Deer Park Avenue, North Babylon, NY 11703
- West Babylon Public Library – 211 Route 109, West Babylon, NY 11704
- Wyandanch Public Library – 14 South 20th Street, Wyandanch, NY 11798
- North Amityville ACE Center – 48 Cedar Road, Amityville, NY 11701
- Lindenhurst Public Library – 1 Lee Avenue, Lindenhurst, NY 11757

The following meetings were held to gather public and private input:

- A Virtual Public hearing for the draft 2021 Annual Action Plan was held on November 17, 2020 which included a sub-recipient meeting for agencies interested in applying for 2021 funding.
- The 2021 draft Annual Action Plan was circulated for public comment from February 26, 2021 through March 29, 2021.
- A Virtual Public Hearing was held on March 16, 2021 to receive comments on the FY 2021 draft Annual Action Plan.

5. Summary of public comments

Public comments received about the FY 2021 Annual Action Plan, along with the Department of Community Development's responses, will be listed below. It incorporates the comments received from two virtual public hearings and the 30-day Public Comment Period, which ran from February 26 through March 29, 2021.

**Any comments received will be listed in the final FY 2021 Annual Action Plan

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

All comments were accepted.

7. Summary

The 2021 Annual Action Plan identifies the community's needs regarding affordable housing, community development, and economic development. It also outlines a comprehensive and coordinated strategy for addressing them. Using CDBG and HOME funds and by leveraging other public and private investment, the Town will support:

1. Housing Rehabilitation Assistance
2. Homeownership Assistance
3. Infrastructure Improvements
4. Public Facility Improvements
5. Clearances and Demolitions
6. Section 108 Loan Repayments
7. Rehabilitation of Publicly or privately owned buildings
8. Public Service

The identification of these strategic priorities is the product of extensive consultation with community stakeholders combined with data from the U.S. Census and other sources. The priorities indicate specific housing and community development needs in the Town of Babylon.

The following pages are copies of the newspaper Affidavits of Publication, public notices that appeared in Newsday, Noticia News and Able Newspaper advertising the two Public Hearing.

1st Virtual Public Hearing – November 17, 2020

2nd Virtual Public Hearing – March 16, 2021

2021 Annual Action Plan

BABYLON TOWNSHIP

OMB Control No: 2506-0117 (exp. 09/30/2021)

PR-05 Lead & Responsible Agencies – 91.220(b)

Agency/entity responsible for preparing/administering the Consolidated Plan and Annual action Plan

The Town of Babylon Department of Community Development is the lead agency for the development, administration, and review of the Annual Action Plan. The Town of Babylon Department of Community Development is the administrator for CDBG and HOME funds in the Town of Babylon. The Town of Babylon Department of Community Development is also the lead agency responsible for coordinating projects identified in the Annual Action Plan. The Plan was developed through collaborative efforts of Town staff and local agencies. Additionally, the Town has cooperative agreements with the Village of Amityville, Village of Babylon, and the Village of Lindenhurst. The Town of Babylon is the lead grant administrator of the grants for the Villages.

Agency Role	Name	Department/Agency
Lead Agency	Town of Babylon	Department of Community Development
Grant Recipient	Village of Amityville	Office of Mayor
Grant Recipient	Village of Babylon	Office of Mayor
Grant Recipient	Village of Lindenhurst	Office of Mayor
Fiscal Administrator	Town of Babylon	Department of Community Development/Comptroller's Office

Table 1 – Responsible Agencies

Consolidated Plan/Annual Action Plan Public Contact Information

Town of Babylon Community Development Office
200 East Sunrise Highway
Lindenhurst, NY 11757
Phone Number: (631) 957-3051

The Strategic Plan outlined in the following sections addresses market conditions, the resources expected to be available to meet community needs, the structure in place for delivering services, goals, barriers to meeting those goals, and how barriers may be overcome. The Strategic Plan also includes a discussion of public housing, homelessness, and an initiative to remediate lead-based paint. It describes the Town of Babylon's anti-poverty initiatives and its plans to monitor performance and compliance.

The priorities are based on the previous needs assessment, market analysis and CDBG and HOME eligibility requirements. The Town will focus their priorities on the types of projects and programs that meet program eligibility requirements, have long term impacts on low and moderate income residents, and help address other federal, state and local priorities, such as fair housing choice and sustainability.

High priorities for the 2020-2024 CDBG program are repayment of Section 108 Loan, public facility improvements, infrastructure improvements, increase affordable housing opportunities, and public service programs. All projects will meet federal CDBG and HOME regulations and address the needs of the communities as identified through input from stakeholders, and focus groups, and feedback from elected officials.

The Town will continue to repay its Section 108 Loan obligations through its annual CDBG allocations. Currently this loan payment amount is approximately 26% of the Town's 2020 allocation. Regardless of the CDBG allocations, the Town will adjust its CDBG budget annually to ensure that this repayment is met. Should there be a decrease in annual allocations, other programs will be cut accordingly in order for the Town to meet this obligation. As such, this is the Town's first and foremost priority.

Collaboration with the not-for-profit partners is essential to provide resources to the residents in an attempt to reduce generational poverty through a variety of programs. The Town will continue to work with local not-for-profits to provide services in the community. These agencies are aware of the gaps in services and will seek to meet those needs. The Town will also continue to work with its local not-for-profit partners and CHDO's to provide affordable homeownership to its residents whether it be through new construction or rehabilitation. Additionally, the Town will continue to provide funding to the three villages for projects that meet CDBG requirements.

Medium priorities for the Consolidated Plan period include homeowner rehabilitation programs. Low priorities are clearance and demolition activities.

The amounts indicated in the FY 2021 draft Annual Action Plan are estimated amounts and are based upon the Town's allocation in FY 2020. The final Plan will be adjusted to match actual allocation amounts received by the Town. If there is an increase in CDBG allocation, it will be applied to the Section 108 Loan repayments, CDBG Home Improvement and facility improvement lines. An increase in the HOME allocation will be applied to the Affordable Housing line. The CDBG and HOME administration, and CHDO Reserve and CHDO Operating lines will be proportionally increased or decreased as per the percentages allowed under the regulations. The allocation to the Villages will also be proportionately increased or decreased based on the CDBG actual allocation.

In 2021, the anticipated amounts for the Town of Babylon are a CDBG allocation of \$1,092,943.00 and a HOME allocation of \$442,411.00. The Final plan will reflect the 2021 actual available funding.

Influence of Market Conditions – 91.215 (b)

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
New Unit Production	The age of the housing stock, the low vacancy, and the waiting lists at existing public and subsidized housing in the Town.
Rehabilitation	Age of housing stock
Acquisition, including preservation	The number of tax delinquent and foreclosed properties; age of housing stock.

Table 2 – Influence of Market Conditions

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

The Town of Babylon Community Development Department conducted significant consultation with citizens, municipal officials, non-profit agencies, public housing agencies, private developers, governmental agencies, and the Continuum of Care in preparing the Consolidated Plan. For the FY 2021 Plan the Town provided multiple opportunities for community participation by holding two public hearings, advertising and mailings to the residents of the Town. These hearing are summarized in the Citizen Participation Section of this plan.

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

The Town of Babylon does not have any public housing agencies within Town limits. However, the Town has made every effort to include all housing providers, governmental agencies, mental health agencies, and service agencies in the preparation of this plan. The agencies provided data on housing choice voucher holder characteristics, waiting lists, and future plans for development.

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

The Town of Babylon is a part of the Long Island Coalition for the Homeless which is funded by the U.S. Department of Housing and Urban Development under the Continuum of Care (CoC) program. The Long Island Coalition for the Homeless strives to eliminate homelessness on Long Island and improve the lives of Long Islanders who are homeless or facing homelessness. In the development of the Con Plan, the Town of Babylon consulted with the Long Island Coalition for the Homeless to gain access to CoC data. The Town was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the Town ensures that CoC goals and the Town’s Consolidated Plan priorities are integrated into the plan.

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 Town of Babylon is not an ESG recipient.

Describe Agencies, groups, organizations and others who participated in the consolidated planning process and describe the jurisdictions consultations with housing, social service

Table 3: Agencies, groups, organizations who participated

1	Agency/Group/Organization	Long Island Coalition for the Homeless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	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?	Homeless Needs; Anti-Poverty Strategy;
2	Agency/Group/Organization	WYANDANCH HOMES AND PROPERTY DEVELOPMENT CORP
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing / Community Meeting
5	Agency/Group/Organization	LONG ISLAND HOUSING PARTNERSHIP, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing / Community Meeting
6	Agency/Group/Organization	WYANDANCH COMMUNITY DEVELOPMENT CORP
	Agency/Group/Organization Type	Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing / Community Meeting
7	Agency/Group/Organization	LONG ISLAND HOUSING SERVICES
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Public Hearing / Community Meeting

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

Efforts were made to consult as broadly as possible with community stakeholders. No particular agency types were excluded from participation.

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	Long Island Coalition for the Homeless	The Town of Babylon consulted with the Long Island Coalition for the Homeless to gain access to CoC data. The Town was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the Town ensures that CoC goals and the Consolidated Plan priorities are integrated into the plan.
Wyandanch Hamlet Plan	Sustainable Long Island	The Wyandanch Rising project and the strategic plan, address housing shortages and affordability.
Long Island Reg. Eco. Dev. Strategic Plan	Long Island Regional Eco Dev. Council	Five-Year Strategic Economic Development Plan
Cleaner Greener Long Island Reg. Sustainable Plan	Cleaner Greener Consortium of Long Island	The Consortium and its partners have established goals and strategies for a regional framework through which to pursue the standards of sustainability: economic prosperity, social responsibility, and environmental health and well-being.

Table 3 – Other local / regional / federal planning efforts

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

Efforts were made to consult as broadly as possible with community stakeholders. No particular agency types were excluded from participation.

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 Town of Babylon will continue to partner with local government agencies to ensure full and complete implementation of the Consolidated Plan. For example, the Town will continue to expand affordable housing opportunities for its residents in partnership with Suffolk County 72-h process, where foreclosed upon properties will be made available for both homeownership and rental development. The Town will also continue to seek funding resources from New York State to advance the various revitalization initiatives that are currently underway in the Town, and CDBG and HOME funds will be provided as leverage/ fund gaps where eligible. The Town will also continue to partner with its two CHDO’s to expand affordable housing opportunities for low-mod income residents.

The Town will continue to partner with the three villages; Village of Amityville, Babylon and Lindenhurst to provide resources to eligible projects in eligible areas.

AP-12 Participation – 91.105, 91.200(c)

Summary of citizen participation process/efforts made to broaden citizen participation and how it impacted goal setting

Citizen participation was achieved through several methods during the planning process. The methods included two public hearings, extensive mailing of public notices to town residents, public notices. Also, flyers in both English and Spanish were posted in the following offices: Town of Babylon Town Clerk, Amityville, Babylon and Lindenhurst Village Halls, the Towns current Subrecipients and Town’s website to garner public and private input. Additionally, the notices were published in the Suffolk Edition of Newsday, the leading regional daily newspaper; the Noticia News; and Able Newspaper.

Citizen Participation Outreach

Sort Order	Method of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted/reason	URL (if applicable)
1	Virtual Public Hearing	Town Wide		0	0	
2	Virtual Public Hearing	Town Wide				

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

HOME Match

HOME regulations require a contribution of non-federal funds totaling 25% of annual HOME expenditure as a condition of accessing the federal program dollars. The Department of Community Development has developed a successful matching fund program for the HOME program. The value of the property that is transferred from Suffolk County is used as the match. The Town is currently using excess match funds from prior fiscal years.

The funding amount indicated in this Plan is based upon the Town’s anticipated allocation from the U.S. Department of HUD. Should there be a change in the allocation amount, the final Plan will be adjusted to match actual allocation amounts received by the Town. The Town’s first priority is repayment of the Section 108 Loan. If there is an increase in the CDBG allocation to the Town, it will be applied towards the infrastructure improvements in the various low-mod areas within the Town and CDBG Home Improvement Program followed by Public Services. If there is a decrease, the Public Service line will be decreased. An increase in the HOME allocation will be applied to the Affordable Housing Line. The CDBG and HOME administration, and CHDO operating lines, will be proportionately increased or decreased, as per percentages allowed under the regulations. The allocation to the Villages will be proportionately increased or decreased to continue to reflect the percentages they currently receive.

The funding amount indicated in this Plan is based upon the Town’s allocation indicated on the U.S. Department of HUD One CPD website as verified by the Town on _____ 2021.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Reminder of Con Plan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	2021 Total: \$		
Public-Federal	CDBG	Administration and Planning, Housing Rehabilitation, Public Improvements, Public Services, Section 108 Loan Repayment, Village of Amityville, Village of Babylon, Village of Lindenhurst	\$1092,943.00	\$100,000.00	N/A	\$1,192,943.00	3,578,829.00	In accordance with 24 CFR Part 570, CDBG funds will be used to benefit low and moderate income residents within the Town of Babylon

Public-Federal	HOME	Administration and Planning, Down Payment Assistance, Housing Rehabilitation, CHDO Operating, CHDO Reserve, Affordable Housing	\$442,411.00	\$100,000.00	\$1,418,813.41	\$1,961,224.00	\$ 3,046,046.00	In Accordance with 24 CFR Part 92, HOME funds will be used to expand affordable housing opportunities within the Town of Babylon
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Table 5 – 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 federal funding listed above is funding which is received annually to support activities outlined in this Plan. Although there are no guarantees of this funding, particularly in the current budget environment, the Town has historically received these funds and expect to continue to receive CDBG and HOME funds for the period covered by this Plan.

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 Town of Babylon does not intend to address the needs identified in this plan with publically owned land or property located within the jurisdiction.

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

The responsibility for the development of the Consolidated Plan is assigned to the Department of Community Development. Community Development is also responsible for developing and administering the Town’s Annual Action Plan and for fiscal management of both CDBG and HOME funds. In addition, public agencies and non-profit organizations assist with providing housing counseling, literacy and job training, and other public services. The Department of Community Development is responsible for monitoring the public service agencies that provide the services to the Town residents.

The Town has designated Community Housing Development Organizations (CHDO), which serve to develop both rental and homeownership units within the Town. As the CHDO’s are ready to develop affordable housing, they submit CHDO applications to the Town. The Town

reviews the proposals, then certifies the CHDO’s on a per-project basis centered on the CHDO checklist. The Town works to ensure that they remain up to date on regulations and best practices, and are organizationally prepared to continue carrying out these activities.

The Town will enter into agreements with all agencies and entities receiving HUD funds to assist with carrying out CDBG and HOME grant activities, and to ensure compliance with regulatory requirements.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Town of Babylon	Entitlement	Participating Jurisdiction	Town of Babylon, NY

Table 6 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

Developing an effective and efficient program has been a priority for the Town. While management of the program has improved considerably over the past few years, the Town continues to monitor, assess, and to enhance its performance and the performance of the agencies who receive HUD funding through the Town. The Town maintains ongoing dialogues with the public agencies and non-profits that work with the Town to implement these programs. The Town also recognizes that with budget cuts, agencies have to do more with less funding, often times with an increased need for their service(s) despite fewer staff. Community Development provides technical assistance to agencies to improve program delivery on an as-needed basis. Processes are revised if shortfalls in program management are noticed.

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	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services		X	

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

Table 7 - 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)

The providers of shelter, transitional housing, and supportive housing for the homeless coordinate their activities and report their services through the Long Island Coalition for the Homeless, which administers the Continuum of Care that includes the Town of Babylon, and its villages and hamlets. The Continuum of Care also includes the remainder of Suffolk County, Nassau County, Islip and Huntington.

All emergency shelter programs, transitional housing programs, and permanent housing programs that have an eligibility requirement of homelessness track client stays, progress and outcomes in the Homeless Management Information System (HMIS), which is administered by LICH. LICH is also the Continuum of Care lead agency for all of Suffolk and Nassau counties, which includes the Town of Babylon. Programs providing housing/services to those actively fleeing or attempting to flee domestic violence do not use HMIS, as per VAWA.

Long Island Coalition for the Homeless staff also coordinate with shelter providers and the Department of Social Services to assist homeless households in obtaining permanent housing, following the region's Prioritization Order which focuses on the length of time homeless and disability.

As per the most recent PIT Count (January 23, 2019) there were 128* Veterans out of 3843 total homeless, or approximately 3% of the total homeless population. Per the same report, there were 81* unaccompanied youth out of the total 3843 total homeless, or approximately 2% of the total homeless population. Chronic homeless households are prioritized for permanent supportive housing placements into CoC-funded permanent supportive housing. *Please note that PIT data captures the total numbers for all of Suffolk and Nassau, not exclusively presenting as homeless in the Town of Babylon.

These small populations are accommodated by homeless providers, as needed, through their existing programs and services. Each client is evaluated during intake to determine the unique needs that the client possesses to ensure that the appropriate services are provided.

All persons living on the street, in shelter, actively fleeing or attempting to flee DV, or at imminent risk of homelessness can access resources and assistance through Coordinated Entry. Those least likely to connect to Coordinated Entry to access housing and services are those living on the street, as many are not captured in HMIS. This appears to be an unmet need (based on the chart provided). Our office is currently partnering with Nassau County on their Consolidated Plan, where stakeholders and advocates have also identified street outreach as an unmet need in their jurisdiction.

Other notable trends include increases in single adult and adult couples that experience homelessness, including significant increases in female single adults that experience homelessness.

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 system used by the Town of Babylon to carry out its services to special needs populations is designed around a partnership concept with the Town acting as the administrator of grant funds. Each of the subrecipients and service providers receiving CDBG or HOME funds from the Town has an important role in the success of these programs. The strength of this relationship is the combined experience and talent of the participating organizations as they serve their respective client populations.

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

The Town will utilize its network of public sector, private sector, and non-profit organizations to implement the strategic plan. Over the next five years, the Town expects to overcome gaps in the institutional structure and delivery system by:

- Training and capacity building for non-profit organizations.
- Monitoring to identify program inefficiencies, improve program performance, and ensure compliance with applicable regulations.
- Encouraging collaboration among agencies to eliminate duplicative services and better serve residents, especially low- and moderate-income households and special needs populations.

The CDP has provided Town of Babylon residents with help at different levels and has created opportunities for people with low- to moderate-income. Projects providing job skills improvement, neighborhood revitalization, housing improvement, housing counseling, affordable housing and others, are successfully operating. While many areas in the Town have evolved positively, workforce housing continues as a major issue, particularly the need for additional rental housing units. The rental sector is affected by a shortage of available units, reductions in the number of Housing Choice Vouchers (formerly Section 8) vouchers available from HUD, and the on-going need for the creation of additional workforce housing units in the Town.

During the community meetings held as part of the citizen participation plan, which incorporates the community's input in the plan; the Town officials heard from stakeholders and residents that the lack of affordable rental units continues as an important weakness in the housing inventory. Consequently, creation of units available for rental continues as one of the most important goals to be achieved in the future.

The Town of Babylon is providing strategies in this Consolidated Plan to offer its residents more suitable and affordable units for ownership and renting. However, it is acknowledged that this is a goal that will extend beyond the plan period 2020-2024.

Since well-developed housing projects improve deteriorated areas and will contribute to neighborhood revitalization and stability, the first steps towards subsequent advances are being developed, as is evidenced by the use of the Town's zoning and housing code that benefit the Town residents and eliminate barriers for the development of housing. Finally, the Town has implemented a strategy that will follow the Smart-Growth guidelines which permit it to implement policies that will help low- and moderate-income residents to acquire and rent suitable housing that they can afford.

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

Under the CDBG Program, the Town conducts on-site monitoring of subrecipients and public service agencies. The Town's CDBG Office has developed standards and procedures for ensuring recipients of CDBG funds are in compliance with HUD regulations and that the funds are disbursed in a timely manner. Should there be a lack of capacity, the Town provides one-on-one technical assistance to agencies.

The Town reviews CDBG and HOME regulations with all subrecipients (current and potential) annually at the public hearing. Subrecipients are expected to attend the public hearings where the Town staff encourages questions and discusses concerns to ensure the program runs efficiently.

The Town identifies subrecipients for monitoring by reviewing each project's progress and any concerns regarding implementation. The staff also ensures that the subrecipients maintain copies of all required documentation and reviews the financial reports. During the monitoring, subrecipients programs are reviewed for overall program management, adherence to national objectives, client eligibility, financial management, record maintenance.

In addition to on-site monitoring of files, Town staff also conducts desk audits of subrecipients. Subrecipients are encouraged to submit vouchers for and drawdown funds in a timely manner. The subrecipient agreement is the enforcement tool to ensure compliance with regulations and reporting requirements.

Town auditors annually audit Community Development program files. The audit of files include a review of expenditures, contract and program eligibility. In addition, Annual Action Plans, Program Income, cash receipt reports and the CAPER is reviewed. The Town Comptroller reviews all financial statements and single audits of all agencies that have applied for funding for concerns or findings that have been raised. Financial statements have to comply with the Uniform Guidance at 2 CFR 200 subpart F (200.500) Audit Requirements. If there are any findings or if the organization fails to comply with any of the terms of the agreement will suspend or terminate the agreement.

Monitoring results are forwarded to the subrecipient who must address concerns in a timely manner. The Town also provides technical assistance during the monitoring to help subrecipients with the timely and accurate implementation of their projects.

Minority Outreach

The Town will continue to actively encourage participation by minority and women-owned businesses among subrecipients who may be procuring goods and services, and ensure subrecipient contract opportunities are incorporated into bid solicitations, requests for proposals, and subrecipient contracts.

Performance Measures

In accordance with HUD's Community Planning and Development Notice 03-09, the Town has developed the following Performance Measurement System designed to measure both the productivity and impact of the CDBG Program:

The Town has adopted HUD's recommended outcome performance measurements system. One of the following statutory goals will be selected for each activity:

- Creating suitable living environments
- Providing decent housing
- Creating economic opportunities

Once the goal is selected, a program outcome (the expected result of the objective the grantee seeks to achieve) is then identified. One of the following outcomes will be selected for each activity:

- Availability/Accessibility
- Affordability
- Sustainability

The Town will prepare a Consolidated Annual Performance and Evaluation Report (CAPER) that will include a review process to Determine whether the specific objectives are being met.

AP-20 Annual Goals and Objectives - 91,420, 91.220 (c)(3)&(e)

Community Development Block Grant						
Goals Summary Information Goal Name	Start Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Section 108 Loan Repayment – Geiger Memorial Park	2021	Creating Suitable Living Environment	Wyandanch	Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for low- and moderate-income residents.	\$279,284.68	Repayment of Section 108 Loan
Village of Amityville - Infrastructure	2021	Non Housing area wide public facility improvements to benefit primarily residential areas, where at least 51% of those residents are L/M income persons. Creating Suitable Living Environment	Village of Amityville	Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for low- and moderate-income residents.	\$42,187.60	Public infrastructure improvements such as water and sewer, drainage, accessibility modifications, sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving, and Handicapped accessibility improvements in downtowns and various other locations to ensure that individuals with physical challenges can safely access services and public spaces in CDBG eligible areas. No. of people assisted – 616

Goals Summary Information Goal Name	Start Year - End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Village of Babylon - Infrastructure	2021	Non Housing area wide public facility improvements to benefit primarily residential areas, where at least 51% of those residents are L/M income persons. Creating Suitable Living Environment	Village of Babylon	Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for low- and moderate-income residents.	\$46,012.90	Public infrastructure improvements such as water and sewer, drainage, accessibility modifications, sidewalks, streetscape improvements, installation of street lights, sidewalks, signs, road paving in CDBG eligible areas. Handicapped accessibility improvements in downtown and various other locations to ensure that individuals with physical challenges can safely access services and public spaces. No. of people assisted – 1,800
Village of Lindenhurst - Infrastructure	2021	Non Housing area wide public facility improvements to benefit primarily residential areas, where at least 51% of those residents are L/M income persons. Creating Suitable Living Environment	Village of Lindenhurst	Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for low- and moderate-income residents.	\$109,294.30	Public infrastructure improvements such as water and sewer, drainage, accessibility modifications, sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving in CDBG eligible areas. Handicapped accessibility improvements in senior centers and various other locations to ensure that individuals with physical challenges can safely access services and public spaces. No. of people assisted – 3,700

Goals Summary Information Goal Name	Start Year - End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Town of Babylon - Infrastructure Improvements	2021	Non Housing area wide public facility improvements to benefit primarily residential areas, where at least 51% of those residents are L/M income persons. Creating Suitable Living Environment	Town wide	Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for low- and moderate-income residents.	\$187,574.92	Public infrastructure improvements such as water and sewer, drainage, accessibility modifications, sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving Handicapped accessibility improvements in downtowns and various other locations to ensure that individuals with physical challenges can safely access services and public spaces, in CDBG eligible areas. No. of people assisted - 10,000
Public Service Agencies	2021	The public service is available to all residents in a particular primarily residential area, and at least 51% of those residents are L/M income persons Creating Suitable Living Environment	Town wide	Improve availability living conditions of L/M income residents	\$135,000.00	Provide public service such as child care, fair housing counseling, employment training, housing counseling, literacy programs, youth services etc. No of people served: 2,000 Fund needs of a food bank No. of people served:10,000
Housing Rehabilitation Assistance	2021	Affordable housing: Creating suitable Living Environment	Town wide	Improve availability living conditions of L/M income residents	\$75,000.00 + Program Income	Homeowner housing units rehabilitated - 3
Administration and Planning	2021	Administration and Planning	Town wide	Admin and Planning	\$218,588.60	Administration and Planning
CDBG Grand Total:					\$1,092,943.00	

HOME Investment Partnership						
Goals Summary Information Goal Name	Start Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Down Payment Assistance Program	2021	Affordable housing: Creating decent housing with improved affordability and availability/ accessibility	Town Wide	Increasing Affordable housing opportunities	\$100,000.00 +Program Income	Down Payment Assistance Program - Direct financial assistance to homeowner No. of Households assisted - 3
CHDO Reserve Projects	2021	Affordable housing: Creating decent housing with improved affordability and availability/accessibility	Town Wide	Increasing Affordable housing opportunities	\$126,049.35	Construction/Rehabilitation of homes for homeownership or rental - 2
Administration	2021	Administration and Planning	Town Wide	Admin and Planning	\$44,241.10	Admin and Planning
CHDO Operating	2021	Operating Expenses	Town Wide	Admin and Planning	\$22,120.55	Admin and Planning
Home Improvement Program	2021	Affordable housing: Creating decent housing with improved affordability and availability/accessibility	Town Wide	Increasing Affordable housing opportunities		Rehabilitation of Owner occupied housing units 0 - Housing Units
Affordable Housing	2021	Affordable housing: Creating decent housing with improved affordability and availability/accessibility	Town Wide	Increasing Affordable housing opportunities	\$150,000.00	Construction/Rehabilitation of homes for homeownership or rental - 2
HOME Grand Total:					\$442,411.00	

Table 50 - Goals Summary

Goal Descriptions

Increase affordable housing opportunities

Affordable housing activities may include acquisition of real property, disposition of real property, residential rehabilitation, clearance and demolition, removal of architectural barriers, and handicapped accessibility. Clearance and demolition will be performed, if needed, to seriously deteriorated buildings in order to improve the neighborhood's livability or to provide lots for new infill construction. Funds from this activity will be used to increase the availability of affordable, safe, and sanitary housing in the low-mod areas of the Town, for households, homeless individuals and families, persons at risk of becoming homeless, and non-homeless persons with special needs.

New York Rising, Governor's Office of Storm Recovery, has transferred 6 Town of Babylon properties purchased from interested homeowners whose homes were substantially damaged or destroyed during Super Storm Sandy to Long Island Housing Partnership for an affordable housing project. The Town of Babylon will be investing HOME funding in the project. These homes will also be receiving New York State ACH funding and SONYMA's Neighborhood Revitalization Program assistance to subsidize the sale price. Properties purchased in this program will be redeveloped in a resilient manner to protect future occupants of the home and maintain the housing stock in the storm-impacted communities. These homes will be sold to income eligible homebuyers.

Reduce generational poverty

Reduce generational poverty and increase self-sufficiency of residents by funding programs through not-for-profit agencies. Public services activities include but are not limited to health, transportation, substance abuse prevention, employment training, youth services, literacy training, child care services, fair housing services, housing counseling, services for immigrants, elderly and frail elderly, persons with disabilities, homeless families and at-risk children and youth, victims of domestic violence, and substance abuse.

Economic development may include job creation and job retention, where at least 51% of the jobs computed on a full time basis involve the employment of low and moderate-income persons, assistance to for-profit businesses, assistance to a microenterprise, and construction or rehabilitation of commercial or industrial property. This program is designed to assist individuals become self-sufficient through education and job placement. This program will address the identified needs of local residents who are unemployed or underemployed by providing them with the skills to increase their marketability to potential employers. The program will also assist in permanent job placement, and include opportunities for child care assistance to single parents with low to moderate income who are engaged in work and/or education.

Improve safety and livability of neighborhoods

Improve safety and livability of neighborhoods by improving or expanding public facilities infrastructure. Public facilities infrastructure includes but is not limited to storm water improvements, reconstruction of streets, sidewalks and parking areas, improvements in street

lighting as a crime deterrent, rehabilitation of community centers and other buildings used to provide services to the public, and accessibility improvements that remove architectural barriers from public facilities such as playgrounds, public buildings, parks, etc.

Prevent and eliminate blighting conditions

The Town of Babylon will continue to undertake activities that reduce slum and blight conditions within the Town. This will be done through programs such as acquisition, clearance and demolition, neighborhood cleanup, façade improvements, code enforcement, and improvements to public facilities.

AP-35 – Projects -91.220 (d)

CDBG Projects Project	FY2021 Funding	Description	Annual Goals	Target Areas	Priority Needs Addressed
Section 108 Loan Repayment Geiger Memorial Park	\$279,284.68	Repayment of Section 108 Loan	Section 108 Loan Repayment	Wyandanch	Section 108 Loan Repayment
Village of Amityville	\$42,187.60	Public infrastructure improvements such as water and sewer, drainage, accessibility modification sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving in CDBG eligible areas. Handicapped accessibility improvements in downtowns areas and other various locations to ensure that individuals with physical challengers can safely access services and public spaces.	Improve safety and livability neighborhoods	Village of Amityville	Infrastructure Improvements
Village of Babylon	\$46,012.90	Public infrastructure improvements such as water and sewer, drainage, accessibility modification sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving in CDBG eligible areas. Handicapped accessibility improvements in downtowns areas and other various locations to ensure that individuals with physical challengers can safely access services and public spaces.	Improve safety and livability neighborhoods	Village of Babylon	Infrastructure Improvements
Village of Lindenhurst	\$109,294.30	The public facility or improvement will be used for an activity designed to benefit persons at least 44.3% of whom are L/M income persons. Acquisition, construction, reconstruction, rehabilitation of public facilities.	Improve safety and livability neighborhoods	Village of Lindenhurst	Public Facility Improvements
TOB Infrastructure Improvements	\$187,574.92	Public infrastructure improvements such as water and sewer, drainage, accessibility modification sidewalks, streetscape improvements, park improvements, installation of street lights, sidewalks, signs, road paving in CDBG eligible areas.	Improve safety and livability neighborhoods	Town Wide	Infrastructure Improvements
Home Improvement Program	\$75,000	Rehabilitation of Owner Occupied housing units	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
Public Service Agencies	\$135,000.00	Provide public service such as child care, fair housing counseling, employment training, housing counseling, literacy programs, youth services, etc.	Reduce generational poverty	Town Wide	Public Services
Administration and Planning	\$218,588.60	Administration and Planning	Administration and Planning	Town Wide	Administration and Planning
Total CDBG:	\$1,092,943.00				

HOME Projects	FY20 Funding	Description	Annual Goals	Target Areas	Priority Needs Addressed
Down Payment Assistance Program	\$100,000.00 + Program Income	Down Payment Assistance Program - Direct financial homeownership assistance	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
Sandy Down Payment Assistance Program		Down Payment Assistance Program - Direct financial homeownership assistance	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
CHDO Reserve Projects	\$126,049.35 + Program Income	Construction/Rehabilitation of homes for homeownership or rental	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
Administration and Planning	\$44,241.10	Administration and Planning	Administration and Planning		Administration and Planning
CHDO Operating Expenses	\$22,120.55	Administration and Planning	Administration and Planning		Administration and Planning
Home Improvement Program		Rehabilitation of Owner Occupied housing units	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
Affordable Housing Program	\$150,000.00	Construction/Rehabilitation of homes for homeownership or rental	Increase Affordable Housing Opportunities	Town Wide	Access to Affordable Housing
Total HOME:	\$442,411				

AP-38 Project Summary

#	Project Name
1	Section 108 Loan Repayment Geiger Memorial Park
2	Village of Amityville
3	Village of Babylon
4	Village of Lindenhurst
5	TOB Infrastructure Improvement
6	Public Service Agencies
7	Down Payment Assistance Program
8	Sandy – Rebuild LI Down Payment Assistance
9	CHDO Reserve Projects
10	CHDO Operating Expenses
11	HOME Improvement Program
12	Affordable Housing
13	CDBG Administration and Planning

Table 9 – Project Summary

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

The following cities are included in the geographic areas of the entitlement which include the Town of Babylon, Village of Babylon, Village of Amityville, and the Village of Lindenhurst.

Geographic Distribution

Target Area	Percentage of Funds
Town of Babylon	46%
Village of Amityville	4%
Village of Babylon	4%
Village of Lindenhurst	10%
North Amityville	17%
Wyandanch	18%

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The need for affordable housing (funded from CDBG and HOME) is present throughout the Town. CDBG funds for direct benefit category are allocated based on the percentage of LMI persons within the LMA neighborhoods. Regarding the Public Services category of the CDBG funds, the proposed projects will focus in the basic needs of the residents such as health care, essential and supportive services, as well as housing services. The special population such as seniors, homeless and youth will continue to receive their funding for the healthcare needs, child care, nutrition needs, education needs, shelter support and recreational needs. The Town has also elected to provide a

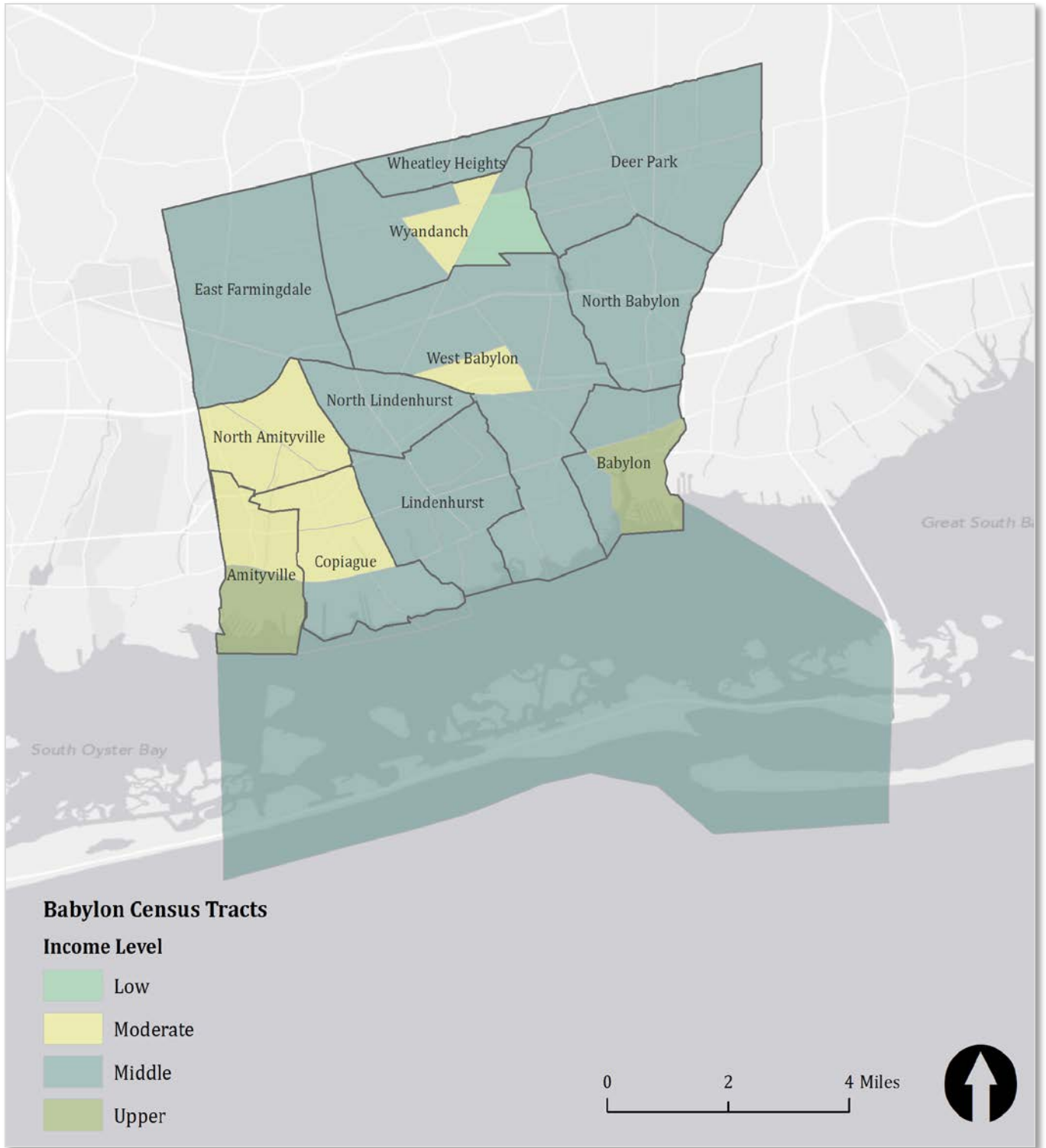
portion of its allocation to participating villages located within the Town.

HOME funds are distributed based on the income eligibility of the clients on a town-wide basis. These allocations also cover designated areas targeted by Code Compliance efforts to reduce and eliminate the deterioration of the areas through the Homeownership program as well as the Housing Rehabilitation program. The top priorities of the Home Rehabilitation program are correcting basic housing conditions that are dangerous to health and safety, bringing homes up to current energy efficiency standards, and correcting violations to Town Code.

Geographic Area

The Town of Babylon will allocate CDBG resources to the low and moderate income census tracts identified by the Federal Financial Institutions Examination Council and shown in the following map. The Town of Babylon has one low income tract – 1225.01 – located in eastern Wyandanch with an estimated median income of \$47,835. The Town of Babylon’s eight moderate income tracts include one tract in Wyandanch, one in West Babylon, three in North Amityville, one in Amityville, and two in Copiague. To generate the greatest impacts and to stabilize neighborhoods, the Town will focus efforts on neighborhoods that currently have Vision Plans in place, have revitalization efforts underway, or have secured and leveraged other funding sources to advance revitalization efforts.

The map on the following page shows eligible low and moderate income census tracts within the town:



Map: Income Level by Census Tract in Town of Babylon, 2013

Data Source: Federal Financial Institutions Examination Council Summary Demographic Info, 2013

Table 10 provides a demographic overview of the Town of Babylon’s low and moderate income census tracts, including estimated median income, low/moderate income share of the population, and minority share of the population. Of the nine low/moderate income tracts, six are majority minority. Median family income ranges from \$47,835 to \$77,519, with low/moderate income populations ranging from 36.3% to 66.1%.

Table 10 - Geographic Priority Areas

Census Tract	Village/ Hamlet	Income Level	2013 Population	2013 Median Family Income	Low/ Moderate Income Share	Minority Share
1224.06	Wyandanch	Moderate	5,356	\$55,417	63.9%	95.6%
1225.01	Wyandanch	Low	4,571	\$47,835	66.1%	95.5%
1229.02	West Babylon	Moderate	4,447	\$77,519	36.3%	17.7%
1232.02	North Amityville	Moderate	8,326	\$76,502	47.8%	91.4%
1233.01	North Amityville	Moderate	7,415	\$61,401	61.5%	86.7%
1233.02	North Amityville	Moderate	1,962	\$72,245	64.2%	97.2%
1235.00	Amityville	Moderate	5,905	\$70,180	40.2%	36.3%
1237.01	Copiague	Moderate	7,044	\$68,062	52.0%	74.9%
1237.02	Copiague	Moderate	8,167	\$75,478	43.5%	41.9%

Data FFIEC Summary Demographic Information, 2013 <https://www.ffiec.gov/census/and> U.S.
Source: HUD Low to Moderate Income Estimates
<http://www.hud.gov/offices/cpd/systems/census/ny/index.cfm>

General Allocation Priorities

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

In allocating investments throughout the Town of Babylon, areas with a high concentration of low-income households will be prioritized for place-based community development strategies. As the preceding map and table show, most of these areas are concentrated in Wyandanch, North Amityville, and Copiague. Input from local service providers and other stakeholders indicate support for revitalization in these areas, and many interviewees identified ongoing efforts in Wyandanch and North Amityville as some of the most successful housing initiatives in the Town of Babylon. These projects include affordable housing and commercial development at Wyandanch Rising, and housing for veterans and their families in North Amityville.

As an exception grantee, the Town of Babylon will limit to areas where at least 44.32% of the households earn less than 80% of the area median income, which is determined annually by HUD. The Town of Babylon will also target properties in these designated areas that are dilapidated in nature and a detriment to the target area.

AP-55 Affordable Housing – 91.220(g)

Introduction

The lack of affordable housing options within the Town of Babylon has been identified as an impediment that needs to be addressed moving forward. There is a need to develop more affordable housing despite limitations that exist such as the lack of suitable undeveloped land. Therefore the goals are focused on rehabilitating the developments that already exist, but have run into a state of disrepair. Once rehabilitated these units can be sold or rented to low-income residents as affordable housing options.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	3
Acquisition of Existing Units	3
Total	10

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion

A summary of affordable housing activities to be undertaken this program year is listed below:

- HOME Improvement Program – This program is designed to make owning a home affordable and safe for low- to moderate-income homeowners, thus keeping residents in their homes.
- Weatherization Program – This program is administered by the Community Development Corporation of Long Island (CDCLI) for Suffolk County. This program is funded through the Department of Energy Weatherization Program and is intended to fund low-income homeowners who wish to weatherize their homes and make them more energy efficient.
- Town-Wide Down Payment Assistance Program – This program provides low- to moderate-income eligible homebuyers with a grant of up to \$20,000.00. The Long Island Housing Partnership administers this program and runs an annual application process for all income-eligible homebuyers.

- HOME CHDO Rental Rehabilitation – This program is intended to develop rental units in the Wyandanch/North Amityville area using HOME funds to serve very low-income residents through the acquisition, and rehabilitation of affordable rental units.
- HOME CHDO New Construction – This program is intended to develop new units in the Town of Babylon using HOME funds to serve low/moderate income homebuyers in achieving homeownership.
- CARES Act Rental Arrears Assistance - for applicants that lost income as a result of the Covid-19 Pandemic.

AP-60 Public Housing – 91.220(h)

The Town of Babylon does not contain any public housing, nor does the Town use any of its CDBG funds for public housing activities. HUD rules do not permit the use of HOME Program funds to fund public housing activities.

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

As the Town of Babylon does not contain any public housing, no actions are planned, nor is funding proposed in 2021 for public housing activities. Having said this, the Town’s Community Development staff will coordinate all public input processes with the Town’s Housing Choice Voucher administrators to offer their voucher clients information about the Town’s use of CDBG and HOME Program funds.

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

As the Town of Babylon does not contain any public housing, no actions are planned to encourage public housing residents to become more involved in management. The Town’s Community Development staff will coordinate with the Town’s Housing Choice Voucher administrators to offer them and their voucher client’s information about the Town’s down payment assistance that is available for qualified homebuyers. Information will also be provided about the Town’s program for the Acquisition/Rehabilitation/Sale of affordable housing to eligible homebuyers. Both programs are funded with HOME Program funds from HUD.

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

As the Town of Babylon has no public housing authority, the response to this item is “Not Applicable.”

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

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

While the Town does not receive ESG funds from HUD, it does support the Continuum of Care [CoC] approach to dealing with persons who are homeless or at risk of becoming homeless. One of the key components of the CoC logic model is service providers performing outreach to these individuals that identifies the needs of each person. The process is aimed at ensuring that each individual receives the services that are appropriate to their circumstances. As there is proposed no funding for this action, there is no specific goal in Action Plan 2019.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the Town does not receive ESG funding from HUD, it continues to support Emergency shelter and transitional housing needs of homeless families and individuals. Examples of this support provided using CDBG public services funds include:

Family Service League	Home Share Program
WCDC	Housing Counseling
WHPDC	Employment Training
Resurrection House	Child Care
The Opening Word	Employment Training
Long Island Housing Services	Tenant/Landlord Counseling
Mercy Soup Kitchen	Soup Kitchen
Long Island Cares	Food Bank
Island Harvest	Food Bank

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

The local CoC works to ensure that homeless individuals make the transition to permanent housing and independent living is prioritizing safe and stable housing and making affordable housing options more accessible to homeless individuals. Many homeless that struggle to transition into permanent housing and independent living suffer from mental illness and substance addiction. Recent trends through the Homeless Prevention and Rapid Re-housing program and Housing First model prioritize placing homeless individuals and families in permanent housing quickly, and then linking them to supportive services in the community. During the consolidated plan period, the Town of Babylon continues to support local organizations, in assisting homeless person with transitional and permanent housing.

The Town of Babylon has no funding for these activities in 2021. However, the Town will continue its support of self-sufficiency programs carried out by agencies such as the Babylon Housing Assistance Agency and similar programs being provided by other public and private agencies that are participants in the Nassau, Suffolk Counties/Babylon/Islip/Huntington Continuum of Care.

The Town of Babylon participates in the Nassau, Suffolk Counties/ Babylon/ Islip/Huntington Continuum of Care which is administered by the Long Island Coalition for the Homeless. The Coalition is responsible for administering programs serving homeless families and individuals for the above political jurisdictions. The Coalition reports these data and results directly to HUD.

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

While the Town of Babylon is not a direct recipient of Emergency Solution Grant funds, the Town will continue to partner with the local CoC to support efforts made to implement locally coordinated discharge policies for individuals or families who are being discharged from a publicly funded institution.

The Town, through its Housing Assistance Agency, will continue to seek additional Housing Choice Vouchers (formerly known as Section 8 vouchers) to serve people who are on its waiting list. Because the likelihood of receiving additional vouchers is low, the Town will attempt to serve these individuals by using the existing Section 8 Program housing inventory (e.g. NSP Holiday Square LLC, project (120 units for elderly). Additional affordable rental units that may be available to Section 8 clients are owned by the Wyandanch Community Development Corporation and the North Amityville Housing Rehabilitation Association.

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

Introduction:

As noted in the Town's 2020 Analysis of Impediments to Fair Housing Choice, the affordable housing barriers for the Town of Babylon include the following:

- A Lack of Affordable Housing Supply
- An Aging Housing Stock
- Resident Viewpoint on Affordable Housing
- Historical Segregation

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.

Discussion:

Barriers to affordable housing can encompass a wide array of aspects, to include but not be limited to banking, finance, and insurance industry regulations, socio-economic situations, neighborhood conditions, and public policy legislation and fair housing enforcement. The Town of Babylon will continue to work with local nonprofit agencies to remove or ameliorate the negative effects of the above listed impediments that serve as barriers to affordable housing through the following actions:

Type of Barrier: Lack of Affordable Housing Supply

The Town of Babylon will continue to offer a town-wide down-payment assistance program that will allow income eligible first-time homebuyers to receive a grant of up to \$20,000.00. This program will be administered by the Long Island Housing Partnership (LIHP).

Additionally a Homeowner Repair Program is offered to current low- to moderate-income homeowners in Babylon. This program is designed to make owning a home affordable and safe, thus resulting in keeping residents in their home instead of having them displaced.

There will also be a targeted effort through the use of HOME funds to acquire, rehabilitate, and rent homes to very low-income residents in the Wyandanch/North Amityville area through the towns designated CHDO.

Type of Barrier: Aging Housing Stock

The Town of Babylon will use its previously described homeowner repair program along with a Weatherization Program. The weatherization program will be administered by the Community Development Corporation of Long Island (CDC) for Suffolk County. The program is funded through a Department of Energy grant and is intended to serve low-income homeowners who wish to weatherize their homes and make them more efficient.

Type of Barrier: Resident Viewpoint on Affordable Housing

The Town will also continue to increase public education on fair housing practices to ensure that the rights of its citizenry are fully protected and enforced. Through partnerships with local non-profit groups the goal is to transform some the misconceptions that come along with affordable housing and help educate the general public on the benefits affordable housing can provide to a community.

Type of Barrier: Historical Segregation

The Town will continue to support programs like Down Payment Assistance and the Home Improvement Program aid in desegregation in a way is consistent with the Town's resources received from HUD. There is also a new affordable housing project with six homes in a high opportunity area.

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the Action Plan narrative presents planned actions by the Town of Babylon that cut across programs. The planned actions that must be reported are:

- Identify obstacles to meeting underserved needs;

- Foster and maintain affordable housing;
- Evaluate and reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination

Actions planned to address obstacles to meeting underserved needs

Major obstacles that are ongoing concerns of the Town are the need for suitable housing for persons with disabilities and the insufficient numbers of rental vouchers versus the numbers of households that need financial assistance in Babylon's high housing cost market.

To address the housing problem for persons with disabilities, the Town will assist organizations seeking to use State funding to house persons with disabilities. The Town may use some of its HOME funding to leverage the state funds or as gap financing in concert with the state funding.

Actions planned to foster and maintain affordable housing

Under Action Plan 2021, the Town of Babylon will continue its existing HOME Program:

- Homebuyer Down-payment Assistance Program - \$3,000 to \$20,000 in the form of a non-interest bearing, forgivable loan, available on a first-come/first-served basis to income-eligible first time homebuyers.
- CHDO Housing – The Town will have certified Community Housing Development Organizations apply for funds to acquire, rehabilitate, or construct rental or homebuyer residential properties, and to provide direct financial assistance to homebuyers. Rental properties will likely be located in the Wyandanch and North Amityville areas which contain low- and moderate income areas.
- HOME Improvement Program – Financial assistance to eligible households for the rehabilitation of existing homeowner occupied residences to comply with Town of Babylon building codes.
- HOME Share Program – Continue to fund this program operated by the Family Service League. The Home Share Long Island provides a solution to urgent community problems: it brings together older, low-income homeowners and low-income home seekers of all ages to share a single family home. It will enable seniors to preserve their homes and independent living status and utilizing the existing housing stock, enables persons of all ages to obtain decent, safe and affordable housing.
- New York Rising, Governor's Office of Storm Recovery, has transferred 6 Town of Babylon properties purchased from interested homeowners whose homes were substantially damaged or destroyed during Super Storm Sandy to Long Island Housing Partnership for an affordable housing project. The Town of Babylon is assisting the homebuyer with up to a \$75,000 grant in the form of down payment assistance, a non-interest bearing, forgivable loan, available to income-eligible first time homebuyers.

Actions planned to reduce lead-based paint hazard

The Town of Babylon's Community Development Department's policies and procedures require that all subrecipients and contractors follow current Federal and Suffolk County guidelines for all projects that may contain lead-based paint (LBP) hazards. This includes the requirements from HUD found at 24 CFR Part 35.

During 2021, the Town's Community Development Department will continue the following actions:

- Provide information to clients and potential clients on lead hazards, testing, and removal.
- Refer inquiries for persons seeking information on LBP to the Suffolk County Department of Health Services.
- Participate in workshops and conferences dealing with LBP.
- Schedule and obtain independent testing of homes undergoing rehabilitation under the Department's housing programs.
- Provide LBP abatement for homes undergoing rehabilitation under the Department's housing programs.

Actions planned to reduce the number of poverty-level families

The Town has targeted its economic development assistance to North Amityville and Wyandanch, the two Census Designated Places that are the most economically challenged areas in the Town of Babylon. During 2021, investments in these areas, as identified in SP-70, will continue through HOME housing programs (homebuyer down payment assistance; CHDO Housing Programs, Affordable Housing Project, and the Home Improvement Program) and through CDBG-funded public services activities carried out by an estimated 12 public and private non-profit organizations. A number of the organizations provide employment training assistance or adult literacy assistance which helps the residents of these areas to enhance their employability and earning potential.

The Town also received CARES Act funding from HUD as a result of the COVID-19 Pandemic. The majority of these funds will go towards a Rental Arrears Assistance program—a program to assist applicants that lost income as a result of the COVID-19 Pandemic.

Actions planned to develop institutional structure

The Town has been receiving HUD grant funds for a number of years and has developed a robust administrative structure to manage its CDBG and HOME funds. The Town's Department of Community Development also trains and works closely with its subrecipients, CHDOs, and contractors. In addition to working with organizations, the Town's Citizen Participation process is designed to make engaged and informed citizens another vital part of the institutional structure.

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

service agencies

The system used by the Town of Babylon to implement its consolidated plan is designed around a partnership concept with the Town acting as the coordinating entity and administrator for plan and program development and management. Each of the subrecipients and service providers has an important role in the successful achievement of plan goals and objectives.

The strength of this relationship is the combined experience and talent from the participating organizations as they serve their respective client populations. This partnership relies on many participants working as a team as they carry out their duties in a manner consistent with the plan's strategies.

The same factor that make the structure strong – a multi-disciplined team – can also be a weakness when one or more of the team members do not follow the plan and/or do not help achieve its goals and accomplish its objectives.

However, on balance, the structure works well and is preferred over the Town's staff attempting to provide all programs and services directly to the Town's residents.

Program Specific Requirements

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

Introduction

The Town of Babylon has re-programmed all program income received. The Town’s resale and recapture policy for their HOME programs, including down payment assistance, home improvement, and affordable housing, is provided below.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

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

is as follows: No additional forms of investment are being used beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254 and description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4), also follows below.

Resale and Recapture

Section 215 of the HOME statute establishes specific requirements that all HOME-assisted homebuyer housing must meet in order to qualify as affordable housing. Specifically, all HOME-assisted homebuyer housing must have an initial purchase price that does not exceed 95 percent of the median purchase price for the area, be the principal residence of an owner whose family qualifies as low-income at the time of purchase, and be subject to either resale or recapture provisions. The HOME statute states that resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including any improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The HOME statute also specifies that recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. **The Town of Babylon only utilizes the recapture methods for HOME homebuyer programs in accordance with 24 CFR 92.254(a)(5).**

The HOME rule at §92.254(a)(5) establishes the resale and recapture requirements for all homebuyer activities. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land. The recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

The Town of Babylon's recapture policy is as follows:

I. DEFINITIONS

Development Subsidy – a development subsidy is defined as financial assistance provided by Babylon to offset the difference between the total cost of producing a housing unit and the fair market value of the unit. When provided independently and absent any additional subsidy that could be classified a direct subsidy, development subsidy triggers resale.

Direct Subsidy – a direct subsidy is defined as financial assistance provided by Babylon that reduces the purchase price for a homebuyer below market or otherwise subsidizes the homebuyer [i.e. down-payment loan, purchase financing, assistance to CHDO to develop and sell unit below market, or closing cost assistance]. A direct subsidy triggers recapture.

Net Proceeds – the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

II. PERIOD OF AFFORDABILITY

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. The amount of HOME assistance in each unit will dictate the applicable period of affordability under the Town of Babylon’s recapture provisions.

a. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the HOME-funded *Direct Subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability.

The following table outlines the required minimum affordability periods.

Homeownership Activity If the total HOME investment or Direct Subsidy in the unit is:	The Minimum Period of Affordability is:
Under \$15,000	5 years
Between \$15,000 and \$40,000	10 years
Over \$40,000	15 years

III. RECAPTURE PROVISIONS

Recapture Provisions permit the original homebuyer to sell the property to any willing buyer during the period of affordability while Babylon is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

a. Applicability

Recapture Provisions are Babylon’s preferred mechanism for securing HOME Program investments and are generally applicable to all homebuyer activities, unless circumstances otherwise require Resale Provisions be used. Specifically, Recapture Provisions are always used in cases involving a *Direct Subsidy* to a homebuyer. Recapture provisions cannot be used when a project receives only a Development Subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, Resale Provisions must be used in this case.

b. Effect

If a homeowner chooses to sell or use the property for non-eligible HOME Program activities during the Period of Affordability, the full amount of the HOME Program Direct Subsidy (specifically excluding the amount of any Development Subsidy) shall be recaptured and repaid to Babylon provided that net proceeds are sufficient. If net proceeds are insufficient to repay the total HOME investment due, only the actual net proceeds will be recaptured. In the event that net proceeds are zero (as is usually the case with foreclosure), the recapture provision still applies, but there are no funds to recapture. Recaptured funds shall be returned to the HOME Trust Fund to be reinvested in other affordable housing for low to moderate income persons.

c. Imposing Recapture Provisions

A clear, detailed written agreement, executed before or at the time of sale, ensures that all parties are aware of the specific HOME requirements applicable to the unit (i.e., period or affordability, principal residency requirement, terms and conditions of either the resale or recapture requirement). The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at §92.504(c)(5) of the HOME rule. If Babylon provides HOME funds to a subrecipient or CHDO to develop and sell affordable housing, Babylon will prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded.

The written agreement between the homebuyer and Babylon, as well as mortgage and lien documents are all used to impose the Recapture Provisions in HOME-assisted homebuyer projects under the recapture option. The purpose of these enforcement mechanisms is to ensure that Babylon recaptures the Direct Subsidy to the HOME-assisted homebuyer if the HOME-assisted property is transferred.

d. Foreclosure

In HOME-assisted homebuyer projects, the affordability restrictions imposed by deed restrictions, covenants running with the land, or other similar mechanisms may terminate upon foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. In such cases, the termination of the affordability restrictions does not satisfy the requirement that the property remains qualified as affordable housing under §92.254 for the period of affordability.

Consequently, homebuyer housing with a Recapture Provision is not subject to the affordability requirements after Babylon has recaptured the HOME funds in accordance with its written agreement. If the ownership of the housing is conveyed pursuant to a foreclosure or other involuntary sale, Babylon shall attempt to recoup any net proceeds that may be available through the foreclosure sale. The Town of Babylon is subject to the limitation that when there are no net proceeds or net proceeds are insufficient to repay the HOME investment due, the Town may only recapture the actual net proceeds, if any.

e. Types of HOME Investment

Down Payment Assistance Program - Forgivable Grant/Mortgage up to \$20,000

Applicants must be income eligible first time homebuyers in the Town of Babylon and occupy the property as their Principal Residence during the period of affordability. The Town of Babylon will recapture all of the HOME assistance provided to the original homebuyer if the homebuyer fails to comply with the affordability period. When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit the amount recaptured cannot exceed the net proceeds, if any.

Affordable Housing Program - CHDO Reserve Funding and Entitlement Funding for Not-For-Profit Organizations

The Town's Recapture affordability period is based on the amount of *direct subsidy* to the homebuyer. The affordability period is enforced by means of a lien, in the form of a note and mortgage, placed on the property. As per 24 CFR 92.254(a)(5)(ii), the Town of Babylon will reduce the HOME investment amount to be recaptured on a prorate basis for the time the homeowner has owned and occupied the housing unit as its Principal Residence measured against the required affordability period. When the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit the amount recaptured cannot exceed the net proceeds, if any.

The formula below will be used to determine the pro-rata amount that will be recaptured by the Town of Babylon:

Determination of the amount forgiven is as follows:

$$\frac{\text{No. of years OWNER owns unit}}{\text{Period of Affordability}} \times \text{Total HOME funds provided} = \text{AMOUNT FORGIVEN}$$

The recaptured amount of homes funds is determined as follows:

$$\text{Total HOME funds provided} - \text{Amount forgiven} = \text{RECAPTURED AMOUNT}$$

IV. REFINANCING POLICY

The Town of Babylon will carefully review all requests for subordination on a case-by-case basis in order to protect its interests and the interests of the homebuyer. The conditions under it will agree to subordinate to new debt are as follows:

- 1) The refinancing must be necessary to reduce the owner's overall housing costs, or
- 2) The refinancing must otherwise make the housing more affordable, AND
- 3) Refinancing for the purpose of taking out equity is not permitted.

Upon receipt of a subordination request from a lender or homebuyer, the Town of Babylon will review the terms of the refinancing to determine whether the above criteria are met. Babylon

may require additional documentation from the homeowner or lender in order to make its determination. Once complete information is received, a subordination decision is made within 15 business days.

V. MONITORING RECAPTURE PROVISIONS

For HOME-assisted homebuyer projects, the Town of Babylon requires its CHDOs and Subrecipients, through written CHDO or Subrecipient agreements, to perform ongoing monitoring of the principal residency requirement during the period of affordability. Confirmation that the buyer is using the property as his or her principal residence may be accomplished by verifying that the buyer's name appears on utility company records or insurance company records for the home. In addition, postcard or letters mailed with "do not forward" instructions may demonstrate whether the buyer is receiving mail at the home.

Failure to comply with the recapture requirements means that:

- 1) the original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or
- 2) The home was sold during the period of affordability and the applicable recapture provisions were not enforced.

In cases of noncompliance under recapture provisions, Babylon must repay to its HOME Investment Trust Fund in accordance with §92.503(b), any outstanding HOME funds invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy to the developer plus any HOME down-payment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount.

VI. APPROVAL OF CHDO & SUBRECIPIENT PROVISIONS

CHDOs and Subrecipients carrying out development and/or homebuyer activities on behalf of Babylon shall be contractually bound to apply and implement these same Recapture Provisions, verbatim. As such, review and approval of Babylon's Provisions shall constitute an effective review and approval of the provisions used by CHDOs and subrecipients.

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: The Town of Babylon has no plans to use HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

Needs and Market Analysis Discussion

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

According to the 2006-2010 CHAS, 52.0% of households in Babylon are cost burdened (spend over 30% of household income on housing costs), 2.3% are overcrowded (more than 1.0 person per room), and 0.8% are substandard (lack complete kitchen or plumbing facilities).

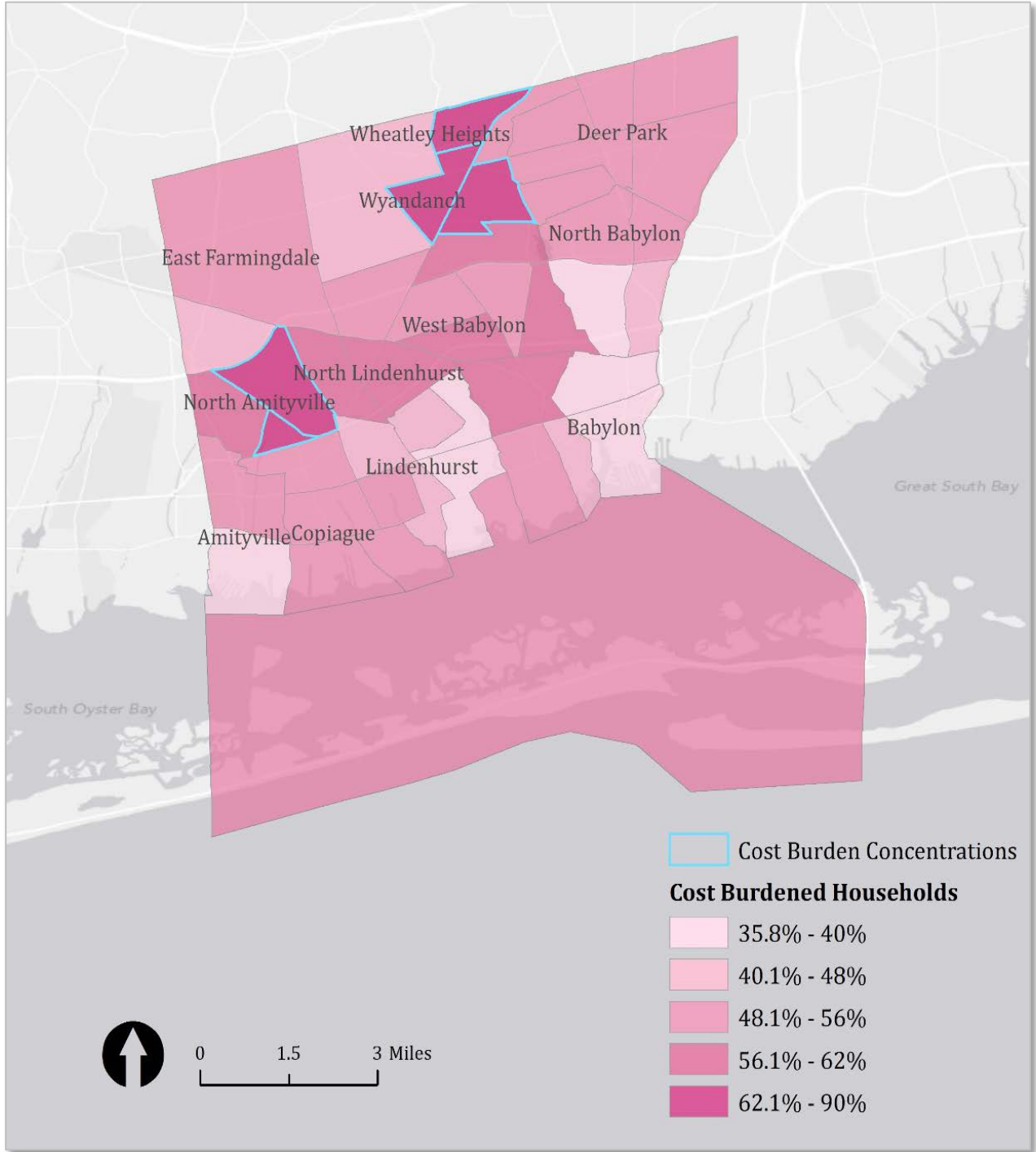
HUD CPD data reveals the incidence of each housing problem by census tract and identifies any concentrations of need in Babylon. For this analysis, an area of concentrated need is defined as a tract where the percentage of households with a housing need is ten percentage points or more above the percentage for the Town. Using this definition, no tract contains a concentration of substandard housing or overcrowded households. The next section shows that each of these tracts also has a concentration of minority residents.

Forty-three block groups, or sections of tracts, are considered low/mod areas. This means that for these block groups, 44.3% of the population is considered low/moderate income.

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

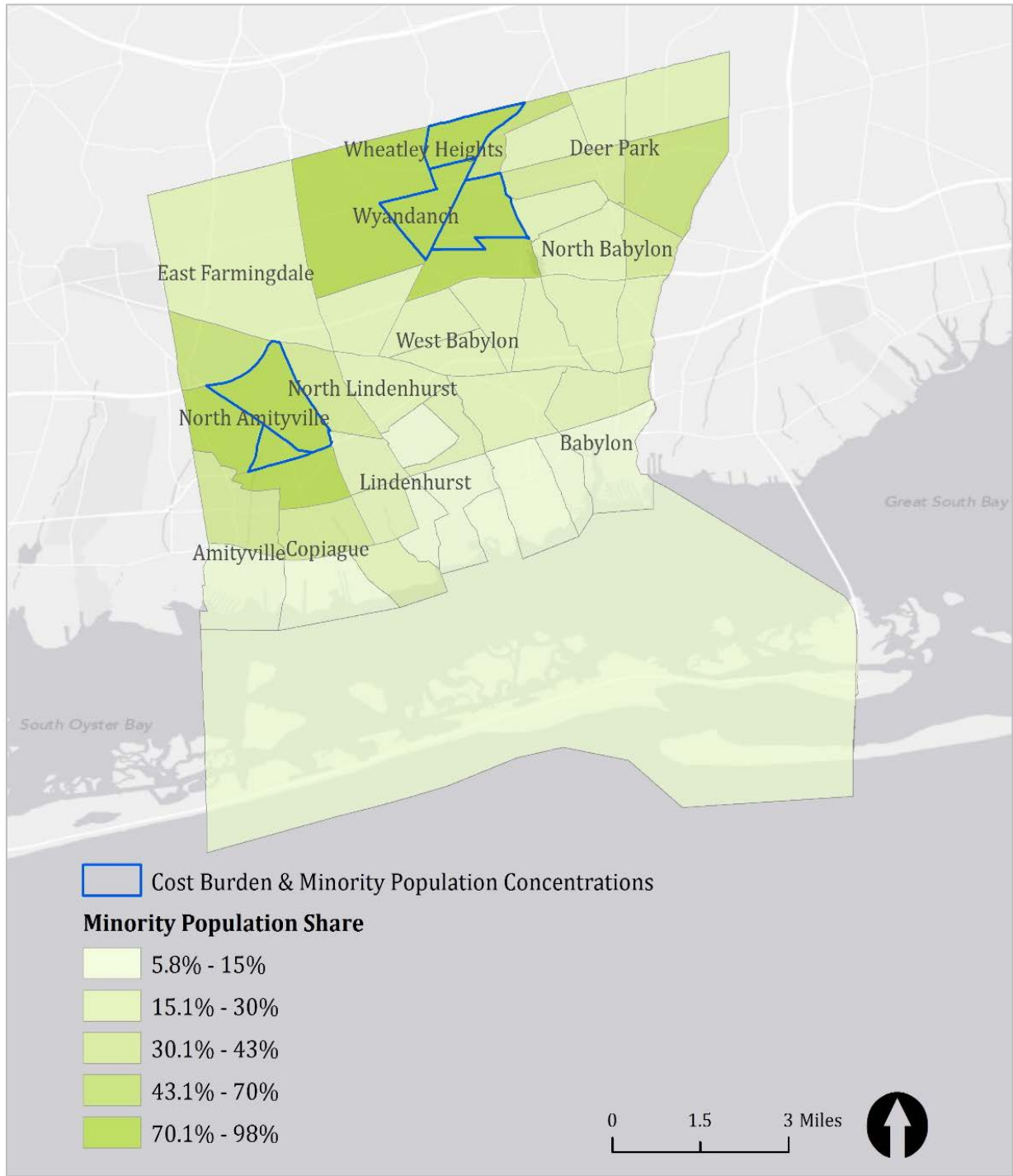
Minority residents make up one-third (34.0%) of Babylon's total population. Using HUD's definition of racial/ethnic concentrations (tracts with a minority population share that is ten or more percentage points above that of Babylon), there are 12 tracts with minority population concentrations in the Town. Of these, five tracts located in Wyandanch, Wheatley Heights, and North Amityville are also areas of concentrated cost burdens.

Map: Cost Burdened Households by Census Tract in Town of Babylon, 2006-2010



Data Source: HUD CPD Map data

Map: Minority Population Share by Census Tract in Town of Babylon, 2013



Data Source: HUD CPD Map data, FFIEC Summary Demographic Information, 2013

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

The table below compares market characteristics between Town of Babylon as a whole and the Town’s 43 low/moderate income area block groups. Overall, housing in the low/moderate income block groups has similar characteristics to housing throughout the Town. The majority of households in each area are owner-occupied, although the target block groups have a lower homeownership rate (63% versus 73.8%).

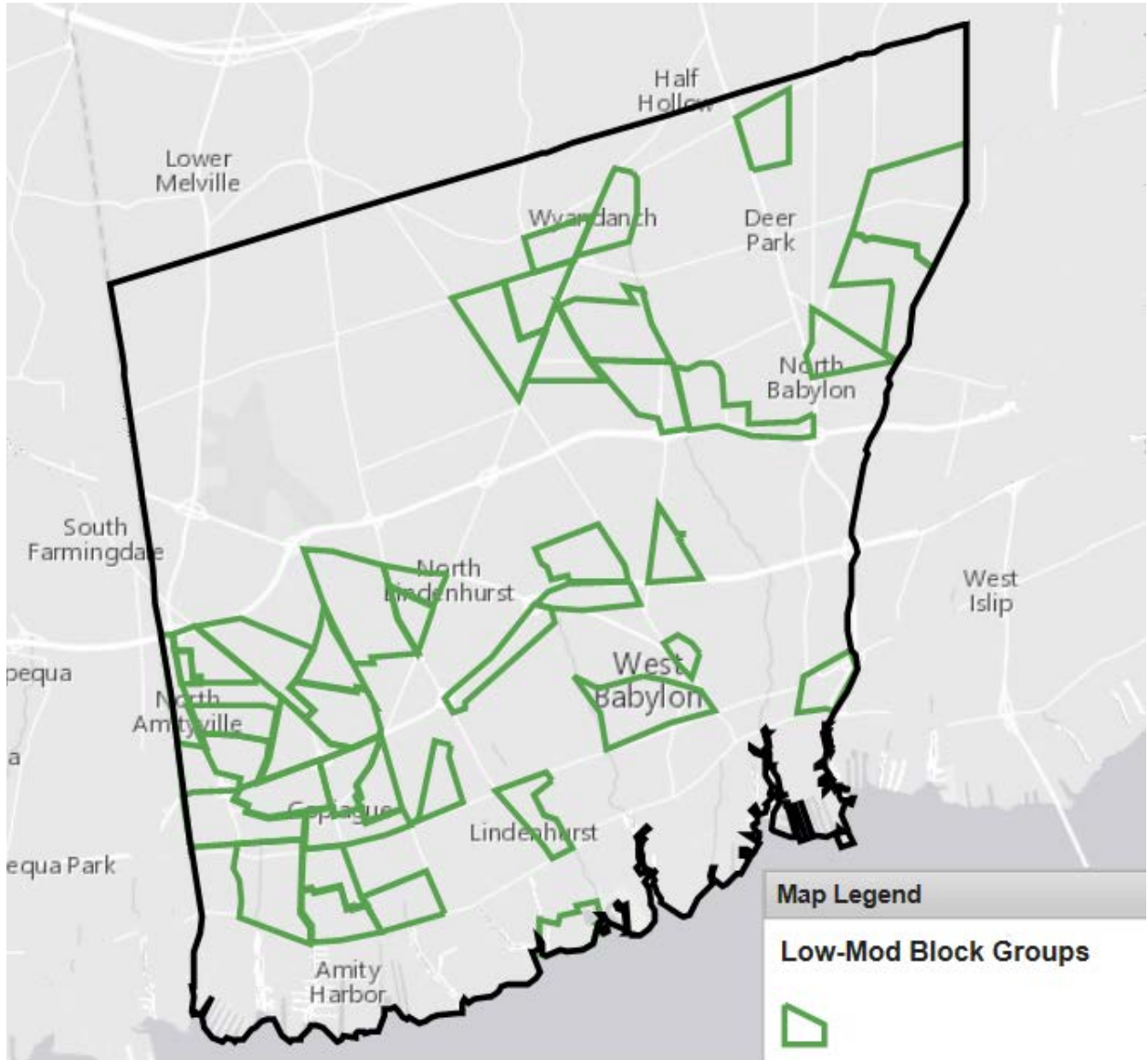
Median home value is lower in the target block groups (\$291,083) than the Town (\$340,600), and median contract rent is lower in the target block groups (\$1,389 versus \$1,487). Housing in the target block groups is newer – 24.5% of units were built since 1980 compared to 15.5% throughout the Town. Detached single family homes make up a smaller proportion of housing in the target block groups (70.7%) than in the Town overall (76.6%), while duplex, triplex, and fourplex units are proportionally similar (10.7% versus 11%).

Table: – Characteristics of Housing Units in low/moderate income area Block Groups in the Town of Babylon

Market Characteristic	Combined Target Block Groups	Town of Babylon
Total housing units	21,617	73,242
Occupied units		
Owner-occupied units	63.6%	73.8%
Renter-occupied units	36.4%	26.2%
Vacancy rate	4.1%	6.1%
Cost & Value		
Median owner-occupied unit value	\$291,083	\$340,600
Median contract rent	\$1,389	\$1,487
Age of housing		
Built in 2000 or later	8.8%	5%
Built from 1980 to 1999	15.7%	10.5%
Built from 1950 to 1979	61.6%	67.2%
Built before 1950	13.9%	17.4%
Units in structure		
1 unit, detached	70.7%	76.6%
1 unit, attached	4.1%	3.5%
2-4 units	10.7%	11%
5-19 units	4.8%	3.5%
20 or more units	6.8%	4.7%
Mobile home, boat, RV, van, etc.	2.8%	.9%

**Data Source:
2015 ACS**

Map: Town of Babylon low/moderate-income area block groups



Source: <https://egis.hud.gov/cpdmaps/>

Application for Federal Assistance SF-424 Forms

Certifications

